



May 9, 2024

Via email: regs.comments@federalreserve.gov

Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

RE: Debit Card Interchange Fees and Routing; RIN 7100-AG67

Ladies and Gentlemen:

On behalf of Bank OZK, this letter is in response to the notice of proposed rulemaking issued on November 14, 2023 by the Board of Governors of the Federal Reserve System regarding Debit Card Interchange Fees and Routing (the "Proposal"). We are a regional bank headquartered in Little Rock, Arkansas, with \$36 billion in assets and 240 offices in eight states. We are also a member of the Mid-Size Bank Coalition of America ("MBCA").

We write to join and express our strong support for the comment letter being submitted by the MBCA. Specifically, we agree with the following points made by the MBCA:

- The Proposal is not proportional to the costs incurred by mid-size banks.
- The Federal Reserve should adopt a tiered approach to interchange fees.
- The Proposal's cost-recovery target is flawed.

We respectfully request that the Federal Reserve consider the recommendations made in the MBCA's comment letter.

Sincerely,

Helen Brown
General Counsel and Corporate Secretary