



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

Dear Sir or Madam:

The Fed's proposed rule **Docket No. R-1818; RIN: 7100-AG67**– would dramatically reduce debit interchange rates for covered issuers under Reg II. The proposal makes changes to update all three components of Regulation II's interchange fee cap and threatens to undo the important work that banks, credit unions, and community groups have undertaken to expand access to safe and affordable financial services.

The proposal is based on flawed methodology that disregards the cost experience for most issuers, especially smaller credit unions. Pamcel Credit Union stands with America's Credit Unions and other financial institutions to strongly oppose any reduction in the interchange fee cap.

Mandy Brockington

Manager

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