



August 5, 2022

The Honorable Reverend Raphael Warnock
United States Senator
Russell Senate Office Building, Suite 388
Washington, DC 20510

Re: Marshall-Durbin Credit Routing Legislation

Dear Senator Warnock:

The Georgia Bankers Association (GBA), Community Bankers Association of Georgia (CBA), and Georgia Credit Union Association (GCUA) are joining forces to oppose federal legislation co-sponsored by U.S. Senators Dick Durbin (D-Illinois) and Roger Marshall (R-Kansas) that would force banks and credit unions to contract with multiple credit card routing companies. This would have a chilling effect on financial institutions' ability to offer a diverse array of credit card products that consumers have come to value greatly.

This proposal will, in fact, reduce the ability of financial institutions to provide the most innovative and secure credit card products in today's marketplace. American consumers exercise their decision-making power to select a credit card in a free market based, in large part, on the trust, security, benefits, and protections the card offers. Government interference with consumers' ability to choose is misplaced. It will negatively affect financial institutions while bolstering the profits of big-box retailers and e-commerce giants that already benefit greatly from the strongest financial services network in the world. There's no evidence those merchants have passed on savings as promised for changes mandated for debit card routing by prior legislation, and consumers are, in fact, harmed by reduced network quality, reduced consumer protections, and reduced security.

We urge you to not support such changes as we have significant concerns about the effects they will have on financial institutions and the consumers they serve. Routing mandates represent government interference in a well-functioning market and federal second-guessing of complex and dynamic private sector decisions. Like all mandates for a company to purchase a service, this would be a matter of the government substituting its judgment for that of the parties directly involved. There is no public policy justification to do that.

With the above facts in mind, on behalf of Georgia's financial institutions, we respectfully ask that you oppose such a measure as it would not benefit consumers in terms of cost or enhanced security. Additionally, it would reduce options for consumers as more and more small issuers will be forced to exit the credit card business altogether.

Sincerely,

Joe Brannen
President & CEO
Georgia Bankers Association

John McNair
President/CEO
Community Bankers Association of Georgia

Samantha Beeler
President
Georgia Credit Union Association