



**Innovative Payments Association**

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June 11, 2021

**Submitted via E-Mail at:** [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

Ann E. Misback, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue NW  
Washington D.C. 20551

Re: Notice of Proposed Rulemaking  
[Docket No. R-1748, RIN 7100-AG15]

Dear Ms. Misback:

This letter is submitted to the Board of Governors of the Federal Reserve (the "**Board**") on behalf of the Innovative Payments Association ("**IPA**"),<sup>1</sup> in response to the Notice of Proposed Rulemaking concerning Debit Card Interchange Fees and Routing issued by the Board on May 7, 2021 and published in the Federal Register on May 13, 2021 (the "**Proposed Rule**").<sup>2</sup> While the Proposed Rule has an initial deadline for comments of July 12, 2021, we respectfully request that the Board extend deadline for an additional 30-day period. The Proposed Rule is highly complex and it will require additional time for the IPA to gather the feedback needed from its members to offer substantive comments to the Board. We believe such additional time will improve the accuracy, specificity, and overall quality of the IPA's comments on the Proposed Rule.

For this reason, we request a 30-day extension of the July 12, 2021 deadline for comment to the Board on the Proposed Rule.

The IPA appreciates your consideration of our request for an extension of the comment period. If you have any questions or wish to discuss this letter, please do not hesitate to contact me at: [btate@ipa.org](mailto:btate@ipa.org).

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<sup>1</sup> The IPA is a trade organization that serves as the leading voice of the electronic payments sector, including prepaid products, mobile wallets, and person-to-person (P2P) technology for consumers, businesses and governments at all levels. The IPA's goal is to encourage efficient use of electronic payments, cultivate financial inclusion through educating and empowering consumers, represent the industry before legislative and regulatory bodies, and provide thought leadership. The comments made in this letter do not necessarily represent the position of all members of the IPA.

<sup>2</sup> 86 Fed. Reg. 26189 – 26195 (May 13, 2021).



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Sincerely,

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Brian Tate  
President and CEO  
IPA

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