

# Dan M. Fisher Presents:

## Community Financial Institutions Network Operating Rules

### BILL OF RIGHTS

1. Network Operating Rules should be exclusively used for Governance Only.
2. Card Payment Networks should be transparent and focused on the issuer.
3. Card Payment Networks should respect and support the debit card business operating model of exempt financial institutions.
4. All Card Payment Network related products and pricing should be disclosed in the processing contract (not in the rules).
5. All new products and associated pricing should be disclosed in writing and by amendment from the Card Payment Network with the issuer option not to participate.
6. Any Card Payment Network rules or pricing implemented by the Card Payment Network that an issuer does not agree with gives the issuer the right to leave the Card Payment Network without penalty or triggering the early or convenience termination clause.
7. Any exempt financial institution should have the right to opt-out of any PINless Debit Rule
8. No Network PINless Debit Operating Rule shall be allowed to increase the risk, loss, or limit the charge-back rights of any exempt issuer.
9. Issuers should be given the opportunity to opt-out of any rule change prior to implementation.
10. The Card Payment Network must disclose, in advance, any price change, any interchange rate change, and the corresponding impact on net interchange income to the issuer.
11. The Card Payment Network must include with the monthly processing invoice a full-reconciliation of interchange income at no charge to the issuer.
12. All Card Payment Networks should post publicly their Network Operating Rules just like VISA and Mastercard.