

Congress of the United States
Washington, DC 20515

October 17, 2018

The Honorable Joseph Otting
Comptroller of the Currency
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, D.C. 20219

The Honorable Jelena McWilliams
Chairman
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, D.C. 20429

The Honorable Randal Quarles
Vice Chairman for Supervision
The Board of Governors of
The Federal Reserve System
Constitution Ave NW & 20th Street NW
Washington, D.C. 20551

Dear Comptroller Otting, Chairman McWilliams and Vice Chairman Quarles:

We are writing to you concerning a serious matter that affects an entire industry that is a critical component in the provision of financial services throughout the nation. As you know, over half the ATMs in the United States are owned and/or operated by independent nonbank companies or individuals.

In the past several years, we have seen an alarming trend in the discontinuation of banking services extended to independent ATM providers. In response to inquiries regarding these actions, a number of those institutions have asserted that their regulators are pressing for the closure of these accounts. Some have contended that the FFIEC BSA/AML Examination Manual requires that they close them.

Given the importance to consumers and to small businesses of reliable and convenient access to cash, the prospect of losing more than half of the ATMs in the United States is deeply troubling. Without continuous access to banking services, independent owners/operators of ATMs will not be able to keep their businesses open.

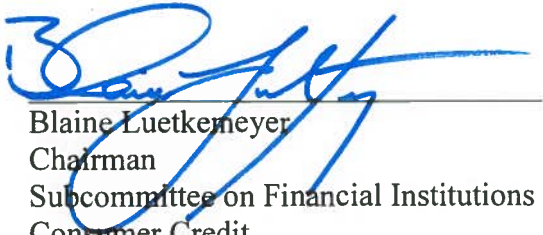
The purpose of this letter is to request that you inform us as to the steps that your agencies can and will take to make it clear to the banking industry that the FFIEC Manual does not mandate the closing of accounts of independent, nonbank ATM owners/operators, where there is no evidence or indication of any improper or unlawful conduct being undertaken in or through those accounts, or by any holder of such an account.

Congress of the United States
Washington, DC 20515

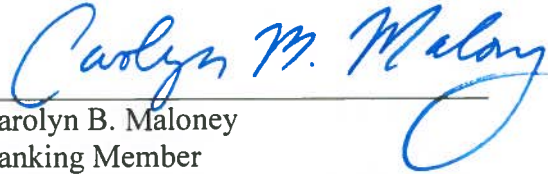
If you believe that amendments are needed to the Manual, please inform us what those changes would be and the time needed to make them. Given the time sensitivity of this matter, we would ask that you respond to us by October 30, 2018.

The unfortunate reality is that this issue is not limited to independent ATM operators alone. Many other businesses, including amusement game operators, and pawn brokers, among others, continue to lose access to basic financial services at an alarming rate. This is despite that the overwhelming majority of them are, licensed, supervised, law-abiding small businesses that provide valuable services to local residents and businesses throughout the nation. We must act expeditiously and aggressively to end this widespread practice and ensure that retail banking services are offered to individuals and businesses in the independent ATM industry and beyond.

Sincerely,



Blaine Luetkemeyer
Chairman
Subcommittee on Financial Institutions and
Consumer Credit
House Financial Services Committee



Carolyn B. Maloney
Ranking Member
Subcommittee on Capital Markets Securities and
Investment
House Financial Services Committee