DEBIT CARD ISSUER SURVEY



Survey Period: Calendar Year 2017

General Instructions

About this Survey

Section 235.8(b) of the Federal Reserve Board's Regulation II requires that issuers covered by the interchange fee standards in Regulation II file reports with the Board. This survey serves as this report. The survey solicits information from calendar year 2017 regarding (1) volumes and values of debit card transactions; (2) volumes and values of chargebacks and returns; (3) the costs incurred in connection with the authorization, clearance, and settlement of debit card transactions; (4) other costs incurred in connection with particular debit card transactions; (5) costs incurred by debit card issuers to prevent fraud in debit card transactions; (6) interchange fees charged or received by debit card issuers in connection with debit card transactions; and (7) the incidence and loss associated with fraudulent debit card transactions. For purposes of this survey, transactions over **three-party systems** are not included—see glossary.

The survey should be filed by the entity that acts as issuer of the debit card involved in the transaction, where the definition of the issuer is, as specified in Section 235.5(a) of Regulation II for purposes of determining an issuer's exemption status, the entity that holds the account that is to be debited. There may be instances in which an entity provides third-party services (such as processing or program management) to the issuer. In these cases, the issuer and <u>not</u> the third-party service provider should file the survey containing information about the issuer's debit cards and debit card transactions. In order to file the survey, it may be necessary for the issuer to obtain information from its third-party service provider, but it is nevertheless the responsibility of the issuer to file the survey. If an entity acts as both issuer on its own behalf and third-party service provider for other issuers, the entity should only include data for the debit cards and debit card transactions for which it acts as issuer, but not data for the debit cards and debit card transactions for which it acts as third-party service provider and another entity acts as issuer.

In addition, Section 235.8(c) of the Federal Reserve Board's Regulation II requires that issuers covered by the interchange fee standards in Regulation II retain records that demonstrate compliance with the requirements of Part 235 for not less than five years after the end of the calendar year in which the debit card transaction occurred.

Your Participation

To achieve the most reliable results, it is important that you respond completely and accurately. Please leave no survey item blank.

There are **three possible ways** to answer a survey question:

Enter a Value: The actual numeric value of the data element.

Enter a Zero: When the calculated value equals zero. Please do not enter a non-numeric value, e.g. "NA" or "NR," when the value equals zero.

Enter "NR" (Not Reported): If your institution engages in the activity of the type being measured but you are unable to report a figure that reflects that activity.
Please do not enter "NA."

If for any reason you cannot provide complete data or you have questions please contact Jessica Stahl at 202-452-6452 or e-mail debit.card.surveys@frb.gov for assistance.

The survey will be made available online at https://www.federalreserve.gov/debitcardsurveys. Please complete the survey by May 1, 2018.

Response Confidentiality and Burden

The Federal Reserve Board regards the individual organization information provided by each respondent as confidential (5 U.S.C. § 552(b)(4)). The Board, however, may publish aggregate or summary information in a way that does not reveal your individual organization's confidential information. If it should be determined subsequently that any information collected on this form must be released, the respondents will be notified.

Public reporting burden for this collection of information is estimated to be 200 hours per response, including the time to gather data in the required form and to review instructions and complete the information collection. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Secretary, Board of Governors of the Federal Reserve System, 20th and C Streets, N.W., Washington, D.C. 20551, or via email to regs.comments@frb.gov; and to the Office of Management and Budget, Paperwork Reduction Project (7100-0344), Washington, D.C. 20503. The Federal Reserve may not conduct or sponsor, and an organization (or a person) is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Section I: Respondent Information

1.	Name of the	debit card issuer covered in this resp	onse	
2.	Contact pers	on(s) by section of the survey for whi	ch responsib	le
	Name		Email	
	Section		Phone	
			J - "	
	Name		Email	
	Section		Phone	
	Name		Email	
	Section		Phone	
	Name		Email	
	Section		Phone	

Section II: All Debit Card Transactions

1c.1 + 1c.2 = 1a

General-use prepaid card

1c.2 All other debit card transactions

transactions

(including general-use prepaid card transactions)

Please enter totals only for transactions and associated costs related to debit cards linked to U.S.-domiciled accounts involving a merchant located in the United States during the calendar year (CY) 2017.

Inclu	ıde:		all debit card transactions (including general-use pre both consumer and business card transactions.	epaid card transactions).
Do N	lot Inc	lude: A	TM or credit card transactions.		
1.			lebit card transactions (including prepaid card transactions)	Volume	Value (\$)
	1a.	pre-au	ed purchase transactions (excluding uthorizations, denials, adjustments, returns, ash back amounts)		
	Card	d-prese	ent vs. card-not-present transactions	Volume	Value (\$)
	1b.	betwee	te "1a. Settled purchase transactions" en the following categories: + 1b.2 = 1a	1a:	1a:
	1b.	betwee	en the following categories:	1a:	1a:
	1b.	betwee 1b.1 +	en the following categories: + 1b.2 = 1a	1a:	1a:
	1b.	1b.1	en the following categories: + 1b.2 = 1a Card-present transactions	1a:	1a:
	Gen	between 1b.1 1b.1 1b.2 eral-us	en the following categories: + 1b.2 = 1a Card-present transactions	1a: Volume	1a: Value (\$)

Gen	eral-us	se prepaid card exemption:		
	-	. non-exempt general-use prepaid actions	Volume	Value (\$)
1d.	trans	re "1c.1 General-use prepaid card actions" between the following categories: 1d.2 = 1c.1	1c.1:	1c.1:
	1d.1	General-use prepaid card transactions exempt from the interchange fee standards.		
	1d.2	General-use prepaid card transactions not exempt from the interchange fee standards.		

2. CY 2	2017 cl	hargebacks and returns	Volume	Value (\$)
2a.	Repor	chargebacks t all chargebacks settled in CY 2017 regardless of te the original purchase transaction took place.		
2b.	followir	e " 2a. Total chargebacks " between the ng categories: $2b.2 = 2a$	2a:	2a:
	2b.1	Fraud-related chargebacks		
	2b.2	All other chargebacks (not related to fraud)		
2c.	Repor	eturns t all returns sent in CY 2017 regardless of the date ginal purchase transaction took place.		

Specific Instructions for Question 3:

Include:

Costs of authorization, clearance, and settlement of all purchase transactions, chargebacks, returns, and other non-routine transactions (e.g. errors).

Both costs associated with interbank settlement and account posting.

All fixed and variable cost components—see glossary.

In-house costs (including costs incurred by affiliated processors—see glossary), network processing fees, and third-party processing fees.

Examples of in-house costs: Labor, equipment/hardware, and software associated with authorization, clearance, and settlement of debit card transactions.

Examples of third-party processing fees: Billed processing fees net of any rebates received tied to the authorization, clearance, and settlement of debit card transactions. This should include billing for returns, chargebacks, and other error processing.

Examples of network processing fees: Switch fees and any other billed network fees tied to the authorization, clearance, and settlement of debit card transactions net of any rebates received.

Do Not Include: Any costs that are not specifically related to the authorization, clearance, and settlement of purchase transactions, chargebacks, and other non-routine transactions. For example, do not include costs related to corporate overhead, account relationships, rewards programs, nonsufficient funds handling, non-sufficient funds losses, cardholder inquiries, card production and delivery, or fraud losses. Also, do not include fraud prevention costs, even if those costs are incurred as part of authorization. In the case of general-use prepaid card transactions, do not include costs associated with funds loads or account set-up and maintenance.

For fees paid for third-party services such as processors and networks and network fees:

Report actual costs net of any rebates received.

For capital expenditures associated with authorization, clearance, and settlement:

Report costs that were depreciated or amortized during 2017 using the U.S. Generally Accepted Accounting Principles (GAAP) or the International Financial Reporting Standards (IFRS).

For costs shared with other card programs or activities:

Allocate the costs based on the number of transactions. For example, if your institution has shared costs for debit and credit card operations, allocate those costs to debit card operations based on the proportion of debit card transactions to total debit and credit card transactions.

For in-house costs incurred as a result of outsourcing to an affiliated processor under the same holding company:

Report costs incurred by the issuer, provided that the costs of the issuer are determined in a way that is consistent with fees that the affiliated processor would charge to an unaffiliated debit card issuer.

3.		2017 costs of authorization, clearance, and clement	Dollars (\$)
	3a.	Costs of authorization, clearance, and settlement	
	3b.	Allocate "3a. Costs of authorization, clearance, and settlement" between the following categories: 3b.1 + 3b.2 + 3b.3 = 3a	3a:
		3b.1 In-house costs	

	3b.2	Third-party processing fees					
	3b.3	Network processing fees					
3c.	proces compa	our institution outsource processing to a sing affiliate under the same holding ny? costs should be included as in-house costs in	[]	Yes	[] No
3d.	autho include shared	our answer in "3a. Costs of rization, clearance, and settlement" an allocation of the debit card portion of costs? please comment on what types of costs are shared	[d a	-	Yes	[h other	activity(ies):

Specific Instructions for Question 4:

Include: All relevant costs that are associated with debit card transactions.

All fixed and variable cost components.

Examples for cardholder inquiries: Inquiries about transactions details, errors, and potential fraudulent activity.

Examples for cardholder rewards: Rewards paid out to cardholders during 2017 even if those rewards were not earned in 2017.

Examples for non-sufficient funds handling: Costs of collection activities and reporting the account to credit agencies.

Do Not Include: Any costs that are NOT associated with debit card transactions.

Examples for cardholder inquiries: Inquiries regarding account balances, rewards programs, credit card transactions, and ATM transactions.

Examples for cardholder rewards: Rewards program administration costs and affinity partner revenue-sharing, and rewards earned by cardholders in 2017, but not paid out in 2017.

Examples for non-sufficient funds handling: Amount of or losses from such transactions.

For capital expenditures:

Report costs that were depreciated or amortized during 2017 using the U.S. Generally Accepted Accounting Principles (GAAP) or the International Financial Reporting Standards (IFRS).

For costs shared with other card programs or activities:

For cardholder inquiries: Allocate the costs based on the number of inquiries. For example, if your institution has a shared call center for debit and credit cards, allocate those costs to debit card transactions based on the proportion of inquiries related to debit card transactions relative to total cardholder inquiries.

For non-sufficient funds handling: Allocate the costs based on the number of non-sufficient funds transactions. For example, if your institution has shared costs for non-sufficient funds handling of debit card and check transactions, allocate those costs to debit card operations based on the proportion of non-sufficient funds debit card transactions to total non-sufficient funds transactions.

4. CY 2017 costs associated with a particular debit card transaction that are not authorization, clearance, and settlement costs

Cardholder inquiries

- **4a.** Costs of **cardholder inquiries** associated with particular debit card transactions
- **4b.** Allocate "**4a.** Costs of **cardholder inquiries** associated with particular debit card transactions" between the following categories: 4b.1 + 4b.2 = 4a
 - 4b.1 Costs related to possible fraudulent debit card transactions

Dollars (\$)	
4a:	

	4b.2 Costs not related to possible fraudulent debit card transactions		
Card	lholder rewards		Dollars (\$)
4c.	Costs of cardholder rewards associated with particular debit card transactions		
Non	sufficient funds handling		Dollars (\$)
4d.	Costs of non-sufficient funds handling associated with particular debit card transactions	_	

5.	CY 2		aud prevention and data security	Dollars (\$)
	5a.	Total costs	fraud prevention and data security	
	Less:	5a.1 to	Transactions monitoring costs tied authorization	
	Less:	5a.2	Your answer to "4b.1 Costs related to possible fraudulent debit card transactions"	4b.1:
	5b.	net of cardh	prevention and data security costs transactions monitoring and older inquiry costs a – 5a.1 – 4b.1	
	5c.	Below an issuexhaus prevale Check	prevention activities are some common fraud prevention activities that wer may engage in. The list is not meant to be stive but rather serves as a way to track the ence of existing fraud prevention techniques. all that apply. Transaction monitoring Merchant blocking Data security PIN customization	
		Othe	Other r fraud prevention activities: ler to track both existing and emerging fraud prevention and detection tech ties not listed above and provide a brief description.	nniques, please list

	012	2017 11	nterchange fee revenue		Dollars (\$)
	6a.		interchange fee revenue received interchange fee revenue)		
		6a.	Interchange fees reimbursed to acquirers		
		ou.	as a result of chargebacks or returns Report reimbursements for all chargebacks or returns sent in CY 2017 regardless of the date the original purchase transaction took place.		
		6b.	Allocate "6a. Interchange fees reimbursed		6a:
			to acquirers as a result of chargebacks		
			or returns" between the following categories: 6b.1 + 6b.2 = 6a		
			6b.1 Interchange fees reimbursed to acquirers as a result of chargebacks		
			6b.2 Interchange fees reimbursed to acquirers as a result of returns		
7.	CY 2	2017 fr	audulent transactions: number	Number	1
7.	CY 2		raudulent transactions: number number of fraudulent transactions		
7.		Total		Number 7a:	
7.	7a.	Allocat trans. To the transa your in	number of fraudulent transactions		
7.	7a.	Allocat trans. To the transa your in	number of fraudulent transactions te "7a. Total number of fraudulent actions" between the following categories: e extent possible, include each fraudulent action in only one category consistent with how astitution categorizes the loss associated with the		
7.	7a.	Allocat transa To the transa your in fraudu	number of fraudulent transactions te "7a. Total number of fraudulent actions" between the following categories: e extent possible, include each fraudulent action in only one category consistent with how institution categorizes the loss associated with the allent activity.		
7.	7a.	Allocate trans. To the transa your in fraudu.	number of fraudulent transactions te "7a. Total number of fraudulent actions" between the following categories: e extent possible, include each fraudulent action in only one category consistent with how institution categorizes the loss associated with the allent activity. Card-not-present		
7.	7a.	Total Allocate transa To the transa your in fraudu 7b.1 7b.2	number of fraudulent transactions te "7a. Total number of fraudulent actions" between the following categories: extent possible, include each fraudulent action in only one category consistent with how institution categorizes the loss associated with the allent activity. Card-not-present Counterfeit		

8. CY	2017 fraud losses: value (all types)	Dollars (\$)
8a.	Gross value of fraudulent transactions	
Less	8a.1 Fraud-related chargebacks net of representments Report all chargebacks sent in CY 2017 regardless of the date the original purchase transaction took place.	
Less	Report all losses absorbed by cardholders Report all losses absorbed in CY 2017 regardless of the date the original purchase transaction took place.	
8b.	Losses incurred by issuer $8b = 8a - 8a.1 - 8a.2$	
9. CY	2017 fraud losses: value (card-not-present)	Dollars (\$)
9a.	Gross value of fraudulent transactions	
Less	9a.1 Fraud-related chargebacks net of representments Report all chargebacks sent in CY 2017 regardless of the date the original purchase transaction took place.	
Less	9a.2 Losses absorbed by cardholders Report all losses absorbed in CY 2017 regardless of the date the original purchase transaction took place.	
9b.	Losses incurred by issuer $9b = 9a - 9a.1 - 9a.2$	

10. CY 2017 fraud losses: value (counterfeit)	Dollars (\$)
10a. Gross value of fraudulent transactions	
Less: 10a.1 Fraud-related chargebacks net of representments Report all chargebacks sent in CY 2017 regardless of the date the original purchase transaction took place.	
Less: 10a.2 Losses absorbed by cardholders Report all losses absorbed in CY 2017 regardless of the date the original purchase transaction took place.	
10b. Losses incurred by issuer $10b = 10a - 10a.1 - 10a.2$	
11.CY 2017 fraud losses: value (lost and stolen)	Dollars (\$)
11. CY 2017 fraud losses: value (lost and stolen) 11a. Gross value of fraudulent transactions	Dollars (\$)
	Dollars (\$)
11a. Gross value of fraudulent transactions Less: 11a.1 Fraud-related chargebacks net of representments Report all chargebacks sent in CY 2017 regardless of the date the original purchase	Dollars (\$)

12. CY 2017 fraud losses: value (other)	Dollars (\$)
12a. Gross value of fraudulent transactions	
Less: 12a.1 Fraud-related chargebacks net of representments Report all chargebacks sent in CY 2017 regardless of the date the original purchase transaction took place.	
Less: 12a.2 Losses absorbed by cardholders Report all losses absorbed in CY 2017 regardless of the date the original purchase transaction took place.	
12b. Losses incurred by issuer 12b = 12a - 12a.1 - 12a.2	

Section III: All Single-Message Debit Card Transactions (excluding general-use prepaid card transactions)

Exact copy of Section II (except 1c and 1d would be removed) but for single-message debit programs only.

Section IV: All Dual-Message Debit Card Transactions (excluding general-use prepaid card transactions)

Exact copy of Section II (except 1c and 1d would be removed) but for dual-message debit programs only.

Section V: General-Use Prepaid Card Transactions

Exact copy of Section II except 1c will be modified to include a breakout of single-message and dual-message transactions as below, and 1d would be removed.

pro	neral-use prepaid card transactions cessed over single-message vs. dual- ssage payment card networks	Volume	Value (\$)
1c.	Allocate "1a. Settled purchase transactions" between the following categories: 1c.1 + 1c.2 = 1a	1a:	1a:
	1c.1 Single-message transactions		
	1c.2 Dual-message transactions		

Glossary of Terms

- **Acquirer:** A person that contracts directly or indirectly with a merchant to provide settlement for the merchant's electronic debit transactions over a payment card network. An acquirer does not include a person that acts only as a processor for the services it provides to the merchant.
- Cardholder inquiries associated with debit card transactions: Cardholder communication with a debit card issuer related to specific debit card transactions, such as inquiries about transactions details, errors, and potential fraudulent activity. These do not include inquiries that are not related to specific debit card transactions, such as account balances, rewards programs, credit card transactions, and ATM transactions.
- **Cardholder rewards:** Incentive payments given to cardholders as a result of particular debit card transactions.
- Card-not-present fraud: Fraud related to card-not-present transactions.
- **Card-not-present transaction:** Settled purchase transaction where the purchaser does not physically present the card to the merchant, such as an Internet, telephone, or mail order transaction.
- **Card-present transaction:** Settled purchase transaction where the purchaser physically presents the card to the merchant.
- **Chargeback:** Transaction initiated by the issuer that reverses a purchase transaction, in whole or in part (due, for example, to customer disputes, fraud, processing errors, authorization issues, and nonfulfillment of copy requests), and transfers value from the acquirer to the issuer.
- Costs of authorization, clearance, and settlement: These costs include in-house costs, third-party processing fees, and network processing fees. These costs do not include, for example, costs related to corporate overhead, account relationships, rewards programs, non-sufficient funds handling, non-sufficient funds losses, cardholder inquiries, card production and delivery, fraud losses, and fraud-prevention costs, even if those costs are incurred as part of authorization. These costs do not include costs associated with funds loads (or deposits) or account set-up and maintenance. These costs should be provided for purchase transactions, chargebacks, and other non-routine transactions.
- **Counterfeit fraud:** Fraud identified as having occurred through the use of a counterfeit reproduction of a debit card.
- **Debit card:** Any card or other payment code or device, issued or approved for use through a payment card network to debit an account, regardless of the means of authorization, and regardless of whether the issuer holds the account. A debit card includes any general-use prepaid card. It does not include (1) any card or other payment code or device that is redeemable upon presentation at only a single merchant, or an affiliated group of merchants for goods or services, or (2) a check draft or similar paper instrument, or an electronic representation thereof.
- **Debit card transaction:** Use of a debit card (including a general-use prepaid card) by a person as a form of payment in the United States to initiate a debit to an account. It does not include transactions initiated at an ATM.
- **Dual-message transaction:** Transaction type by which authorization information is carried in one message and clearance information is carried in a separate message. Typically, these transactions are authenticated with a signature.

- Exempt general-use prepaid card transaction: Transaction using a general-use prepaid card that is exempt from the interchange fee standards in Regulation II, specifically (1) a transaction made using a general-use prepaid card that has been provided to a person pursuant to a federal, state, or local government-administered payment program through which the cardholder may use the debit card only to transfer or debit funds, monetary value, or other assets that have been provided pursuant to such program; (2) a transaction made using a general-use prepaid card that is (i) not issued or approved for use to access or debit any account held by or for the benefit of the cardholder (other than a subaccount or other method of recording or tracking funds purchased or loaded on the card on a prepaid basis), (ii) reloadable and not marketed or labeled as a gift card or gift certificate, and (iii) the only means of access to the underlying funds, except when all remaining funds are provided to the cardholder in a single transaction.
- **Fixed costs:** Costs that do not vary with changes in the number or value of transactions over the course of the reporting period. For in-house fixed costs, these include all capital expenditures that were depreciated or amortized. For third-party processing fees, these include fees that are not assessed on a per-transaction or ad valorem basis. For example, fees associated with minimum volume commitments to third-party processors should be reported as fixed costs.
- **Fraud-related chargeback:** The value of a fraudulent debit card transaction that is charged back to acquirers.
- **Fraud-related chargebacks net of representments:** The value of fraudulent debit card transactions that are charged back to acquirers less the value of representments made by acquirers to debit card issuers.
- General-use prepaid card: A card or other payment code or device that is (1) issued on a prepaid basis in a specified amount, whether or not that amount may be increased or reloaded, in exchange for payment and (2) redeemable upon presentation at multiple unaffiliated merchants for goods or services. NOTE: An institution is an issuer of a general-use prepaid card if that institution serves as a BIN sponsor for a prepaid card program such that (1) the institution authorizes the cardholder to use the card to perform electronic debit card transactions that access the funds in a pooled account, and (2) the cardholder's relationship is with that institution. Include in your response information regarding prepaid cards for which your institution serves as a BIN sponsor in this way.
- **Gross value of fraudulent transactions:** The total value of fraudulent debit card transactions before any recoveries or chargebacks.
- **In-house costs:** Costs of authorization, clearance, and settlement functions that are not outsourced to third parties. Include costs incurred by the card issuer or its affiliated processor (i.e., a processor in the same holding company).
- **Losses absorbed by cardholders:** The value of losses that an issuer recovers from its cardholders. Include any chargebacks to cardholder accounts.
- **Lost and stolen fraud:** Fraud identified as having occurred through the use of a lost or stolen debit card.
- **Network processing fees:** Total fees charged by payment card networks for services that are required for the network processing of transactions. They do not include any fees for optional services related to transaction processing that may be provided by a payment card network or an affiliate of a payment card network. They do not include any network fees, such as membership or license fees, that are not directly linked to the processing of transactions.

- **Non-sufficient funds handling costs:** Costs of handling of events in which an account does not have enough funds to settle an authorized debit card transaction between the time of authorization of that transaction and the settlement of that transaction.
- **Return:** Transaction initiated by the acquirer that reverses a purchase transaction, in whole or in part (due, for example, to the return of goods and services by the cardholder), and transfers value from the acquirer to the issuer.
- **Settled purchase transaction:** A debit card transaction that has been settled. Exclude transactions that are pre-authorizations, denials, adjustments, returns. Exclude cash back value but not transactions.
- **Single-message transaction:** Transaction type by which authorization and clearance information is carried in one message. Typically, these transactions are authenticated with a PIN.
- **Third-party processing fees:** Fees paid to unaffiliated service providers for services related to the authorization, clearance, and settlement of debit card transactions that are performed by those service providers on behalf of the debit card issuer. Service providers may include payment card networks or affiliates of payment card networks to the extent that such parties provide optional services related to transaction processing. They do not include other fees charged by a payment card network for services that are required for the network processing of transactions or fees charged by an affiliated processor (i.e., a processor in the same holding company).
- **Three-party systems**: Systems where debit transactions are processed by an entity that acts as system operator and issuer, and may also act as the acquirer. This entity that receives information from the merchant or acquirer also holds the cardholder's funds. Therefore, rather than directing the transaction information to a separate issuer, this entity authorizes and settles the transaction itself. As these entities do not connect (or "network") multiple issuers and do not route information to conduct the transaction, they are not "payment card networks" with respect to these transactions.
- **Total fraud-prevention and data-security costs:** Costs related to activities aimed at identifying and preventing debit card fraud, costs related to the monitoring of the incidence of, reimbursements received for, and losses incurred from debit card fraud, costs related to responding to suspected and realized debit card fraud in order to prevent or limit losses, costs incurred in securing the data processing and communications infrastructure of debit card operations, and costs incurred in the development or improvement of fraud-prevention technologies.
- **Total interchange fee revenue received:** Total value of fees received that are established, charged, or received by a payment card network and paid by a merchant or an acquirer for the purpose of compensating an issuer for its involvement in the debit card transaction.
- **Total number of fraudulent transactions:** The total number of all fraudulent debit card transactions identified by the issuer. Include fraudulent transactions charged back to acquirers.
- **Transactions monitoring costs:** Costs related to programs that monitor transactions in order to assist in the authorization process by providing information to the issuer before the issuer decides to approve or decline the transaction. These costs include the costs of neural networks and fraud-risk scoring systems.
- **United States:** The states, territories, and possessions of the U.S., the District of Columbia, the Commonwealth of Puerto Rico, or any political subdivision of any of the foregoing.
- **Variable cost:** Costs that directly vary with the number or value of transactions over the course of the reporting period. In-house variable costs, for example, may include certain labor costs. Variable

costs related to third-party processing fees are those fees assessed on a per-transaction or ad valorem basis.