

July 8, 1997

Mr. John Galligan
Director, Card Technology Division
U.S. Department of the Treasury
Room 526, Liberty Center
401 14th Street, S.W.
Washington, D.C. 20227

**Re: Comment on Notice of Proposed Rulemaking - 62 Fed.
Reg. 25572 - 25576 (5/09/97)**

Dear Mr. Galligan:

Enclosed herewith please find the comments prepared by the National Consumer Law Center on behalf of both our low income clients and the following additional organizations: Public Voice for Food and Health Policy, the Welfare Law Center, the National Community Reinvestment Coalition, the National Rainbow Coalition, and the California Reinvestment Committee.

As noted in our comments, we have a number of serious concerns with the regulations as proposed and urge you to reissue a revised NPRM addressing these matters before proceeding to finalize these rules. We stand ready to assist you in any way we can as you proceed in this endeavor and look forward to continuing to work with FMS and the other Treasury divisions to assure that EFT-99 truly results in enhanced services and improved benefit delivery to recipients of direct federal benefit payments.

Sincerely,

Barbara Leyser
EBT Consultant

Margot Saunders
Managing Attorney