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August 16, 2010

Larry R. Felix, Director  
Bureau of Engraving and Printing, Office of External Relations  
14<sup>th</sup> and C Streets, SW, Room 530-1M  
Washington, DC 20220

Submitted via e-mail

Re: Meaningful Access to Currency for Blind or Visually Impaired Persons,

Dear Director Felix:

The Independent Community Bankers of America (ICBA)<sup>1</sup> appreciates the opportunity to comment on a proposed agency action by the Bureau of Engraving and Printing to provide meaningful access to U.S. currency to people who are blind or visually impaired.

### **Background**

The Department of the Treasury (“Treasury”) and the Bureau of Engraving and Printing (“BEP”) are issuing this Notice pursuant to the ruling in *American Council of the Blind v. Paulson* pursuant to section 504 of the Rehabilitation Act of 1973, as amended. BEP seeks to develop a solution that fully complies with the Court’s order and provides people who are blind or visually impaired meaningful access to U.S. currency and ensure that there are no disruptions in the flow of U.S. currency.

### **Summary of Proposed Action**

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<sup>1</sup> The Independent Community Bankers of America represents nearly 5,000 community financial institutions of all sizes and charter types throughout the United States and is dedicated exclusively to representing the interests of the community banking industry and the communities and customers we serve. ICBA aggregates the power of its members to provide a voice for community banking interests in Washington, resources to enhance community bank education and marketability, and profitability options to help community financial institutions compete in an ever-changing marketplace.

With nearly 5,000 members, representing more than 20,000 locations nationwide and employing over 300,000 Americans, ICBA members hold \$1 trillion in assets, \$800 billion in deposits, and \$700 billion in loans to consumers, small businesses and the agricultural community. For more information, visit ICBA’s website at [www.icba.org](http://www.icba.org).

To ensure access to currency by the blind or visually impaired, the BEP proposes the following action:

1. *Tactile Features*--BEP will develop a raised tactile feature, unique to each Federal Reserve note to provide users with a means of identifying each denomination by touch.
2. *Large, High-Contrast Numerals* – Future currency designs will incorporate large, high-contrast numerals and different and distinct color schemes for each denomination. This is consistent with recent currency redesigns.
3. *Supplemental Currency Reader Program*-- BEP will develop a process to loan and distribute currency readers to the blind or visually impaired at no cost. This process will provide immediate access during the transition to tactile features and high contrast numerals.

### **ICBA Comments**

ICBA commends the BEP for its research and work to identify meaningful, cost-effective solutions that will help people who are blind or visually impaired denominate currency. ICBA applauds the BEP for crafting a proposal designed to provide meaningful access to the blind or visually impaired while minimizing disruptions in currency delivery through automated teller machines (ATMs), teller station currency dispensers, currency counting machines, and other cash-processing equipment.

#### Tactile Features

ICBA supports the addition of tactile features into U.S. currency, provided they are thoroughly tested and are proven not to impede the function, or increase the cost of existing and new currency processing equipment, and provided that financial institutions are not responsible for determining when the tactile feature is no longer readable.

ICBA also urges the Treasury or BEP informal advisory group of industry experts to assist with the design of the tactile features. Improperly designed tactile features could make existing currency processing equipment obsolete or require the machinery to undergo expensive modifications and service at additional expense for all stakeholders, including consumers. While recent research conducted by the BEP, along with this public forum, will help avoid potential currency design issues or errors, a temporary tactile advisory group may provide additional, more detailed expertise and assurances going forward.

Finally, ICBA urges Treasury and BEP not to compel that tactile features of currency be included in currency fitness requirements. While BEP research shows that tactile features eventually wears out, existing currency fitness requirements are sufficient to remove these notes from circulation without updating currency

processing equipment to incorporate new currency processing requirements specific to the tactile features.

### High Visibility Numbers

ICBA supports the incorporation of large, high-contrast numerals and different and distinct color schemes for each denomination in future currency designs to assist visually impaired people.

### Supplemental Currency Reader Program

ICBA wholeheartedly supports the establishment of a program to provide blind or visually impaired people an independent means that can be used to correctly identify U.S. currency denominations. Through this program, BEP will loan currency reader devices to all blind or visually impaired U.S. citizens and legal residents upon request. This program provides immediate access to currency for people who are blind or visually impaired and is not dependent on future currency designs and will have no impact on current cash processing equipment.

In conclusion, ICBA commends BEP for seeking to develop meaningful, cost-effective solutions that will provide meaningful access to currency for people that are blind or visually impaired. ICBA cautions BEP to make certain that the inclusion of a tactile feature does not interfere with new and existing cash processing equipment and that currency fitness requirements are sufficient to monitor the effectiveness of the tactile feature. ICBA recommends the formation of an industry advisory group to ensure that the tactile feature causes minimal disruption to cash-processing equipment. ICBA supports the addition of high visibility numbers, and supports the supplemental currency reader program as a means to provide access without designing and printing new currency.

Again, ICBA appreciates the opportunity to comment on this proposed clarification. If you have any questions or would like additional information, please contact the undersigned by telephone at (202) 659-8111 or by e-mail at [cary.whaley@icba.org](mailto:cary.whaley@icba.org).

Sincerely,

/s/

Cary Whaley

Vice President, Payments & Technology Policy