

January 16, 2024

Chairman James Sanders  
Senate Committee on Banks  
Legislative Office Building, Room 711  
Albany, New York 12247

**Re: ETA Concerns with S.B. 177**

Dear Chairman Sanders,

On behalf of The Electronic Transactions Association “ETA”, the leading trade association for the payments industry, I would like to express opposition to Senate Bill 177 as currently drafted. While ETA understands the importance of informing consumers about possible fraudulent activities when transferring money, the legislation as currently drafted provides covered entities no room to adjust the warning based on the changing nature of fraud. The current language of the bill may inadvertently create more confusion for consumers than preventing fraud.

ETA would support amended language that creates a disclosure framework for New York consumers that provides flexibility as the money transmission market and types of fraud facing consumers evolves. ETA offers our assistance in crafting a legislative measure that accomplishes the legislation’s goal of informing fraudulent activity to consumers when transferring money while also adapting to the ever-changing technology and types of fraud deceiving New Yorkers.

ETA is the leading trade association for the payments industry, representing over 500 companies that offer electronic transaction processing products and services, including financial institutions, transaction processors, payments networks, and others.

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We appreciate you taking the time to consider these important issues. If you have any questions or wish to discuss any issues, please contact me or ETA Senior Vice President, Scott Talbott at [Stalbott@electran.org](mailto:Stalbott@electran.org).

Respectfully submitted,

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