



DCUC
DEFENSE CREDIT UNION COUNCIL

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Jason Stverak
Chief Advocacy Officer

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The Honorable John Thune
Senate Majority Leader
United States Senate
Washington, DC 20510

The Honorable Charles E. Schumer
Senate Minority Leader
United States Senate
Washington, DC 20510

Oppose Commissary Interchange Provisions in the FY2027 NDAA

Dear Majority Leader Thune and Minority Leader Schumer:

On behalf of the Defense Credit Union Council (DCUC), I urge you to reject any commissary interchange amendment to the Fiscal Year 2027 National Defense Authorization Act (NDAA), including a study, report, pilot, or data-collection requirement intended to advance restrictions on payment-card interchange or routing. DCUC also strongly opposes attaching the Credit Card Competition Act (CCCA) or related Durbin-Marshall routing mandates to this legislation. Military families deserve a defense bill that strengthens their financial security. They should not be used to advance a retail-industry campaign that could weaken the financial services they depend on.

DCUC represents more than 200 member credit unions serving 47 million members, with combined assets exceeding \$525 billion. Our members serve active-duty servicemembers, National Guard and Reserve members, veterans, Department of Defense civilians, and military families. Their experience gives us a direct stake in protecting reliable payments and affordable financial services during deployments, relocations, and emergencies.

This request follows our [June 29, 2026 letter to House leadership on the FY2027 NDAA](#), which expressly opposed last-minute interchange and payment-routing provisions, including studies of card fees at commissaries, exchanges, and other on-base retail locations. We ask Senate leadership to uphold that same principle throughout floor consideration and negotiations on the final bill.

Our opposition is longstanding. In his [July 15, 2024 letter to Senate leadership](#), DCUC President and CEO Anthony Hernandez warned against using a commissary study to build support for the CCCA and raised concerns about military patrons' privacy and payment security. DCUC joined the [August 19, 2025 financial-trades letter](#) opposing both the CCCA and the commissary study in the FY2026 NDAA. My [September 1, 2025 letter to the Armed Services Committees](#) reinforced those objections, and DCUC's [September 2 public statement](#) emphasized the consequences for military families. These concerns remain central to our position today.

Calling a proposal a study does not resolve the policy concerns behind it. A study alone would not impose the CCCA's routing requirements, but it could provide the foundation for later mandates while giving those proposals the appearance of a military-readiness measure. Congress should reject an approach that treats lower interchange as the desired conclusion before weighing the full costs to cardholders, credit unions, and the payments system. Any legitimate review must account for fraud losses, cybersecurity investment, access to credit, and consumer benefits alongside processing expenses.

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Interchange revenue helps credit unions pay for card services, fraud detection, and the systems that keep payments available around the clock. Reducing that revenue does not eliminate those obligations. It can instead put pressure on member fees, card benefits, and credit availability. A credit union's exclusion from a mandate's direct coverage would not necessarily shield its members from changes in network economics or compliance costs across the broader market.

Those tradeoffs matter acutely to military households. A servicemember overseas needs a payment card that works and a financial institution that can respond when fraud occurs. A family moving to a new installation needs dependable access to funds. Cash-back benefits and affordable credit can help a household manage travel and unexpected expenses. Congress should demand evidence of a net benefit to these families before advancing policies that could make their financial services more costly or less accessible.

A reduction in processing costs is not, by itself, proof of a lower grocery bill or a better financial outcome for a military family. Concerns about charges borne by eligible commissary patrons should be addressed through targeted commissary policy and funding decisions. They do not justify using military shoppers as the rationale for a broader restructuring of private payment networks. Congress should also protect those shoppers' privacy: any proposed collection of transaction information must have a demonstrated need, clear limits, and appropriate safeguards. Identifiable financial data should never become the price of a supposed consumer benefit.

We support practical, bipartisan reforms that strengthen military financial readiness. Our [September 8, 2026 letter to congressional leadership](#) sought a carefully negotiated financial services section in the FY2027 NDAA, including consideration of liquidity preparedness, loan-maturity modernization, and veteran business lending. That request does not provide a rationale for adding controversial interchange provisions. Payment-policy changes require scrutiny by the committees of jurisdiction and meaningful input from the institutions and military communities affected.

Please exclude the commissary interchange amendment and related language from any floor amendment package, manager's amendment, negotiated agreement, or final FY2027 NDAA. This request covers a stand-alone study as well as any provision advancing interchange restrictions or compulsory routing. Our servicemembers and veterans have earned Congress's protection. They should not bear the financial risks of a policy promoted in their name without a demonstrated benefit to them.

Thank you for your consideration. I welcome the opportunity to discuss these concerns with your offices and provide the perspective of the defense credit unions serving your constituents. Please contact me at jstverak@dcuc.org or 202.557.8528.

Serving ALL Who Serve,



Jason Stverak
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DCUC

Cc: Members of the United States Senate