

### **What is an Undue Burden?**

An undue burden is defined as a "significant difficulty of expense." I know you are thinking that's not helpful, but it's all we can say with certainty. Whether a bank will have to upgrade existing ATMs will be determined by its resources -- or those of its holding company, if applicable -- along with the modification costs.

Obviously, if a bank is not profitable at this time, nothing would need to be done. If it is, or if it becomes profitable again at a later date, then the bank has more to do. It should begin by assessing what needs to be modified on each ATM, talk to its ATM vendor and determine the cost of required hardware and software modifications. Then factor in time (i.e., IT employee costs installing the software changes and making them "communicate" with your network provider). Once the bank has these figures it can balance this against the bank's earnings and establish a reasonable schedule for achieving compliance with the standard.

-Virginia O'Neil ABA