



Position: ATMIA^{1[1]} opposes federal or state legislation mandating a standard for illumination at ATMs.

Although the ATM Industry Association (ATMIA) and the Global ATM Security Alliance (GASA) recommend installing ATMs in well-lit surroundings, there is a growing consensus among professionals in the industry that it would be impractical to legislate on a standard for illumination at ATMs.

International security guidelines on the recommended minimum degree of illumination at ATMs have already been published in GASA's Version 2 of its Best Practice for Physical ATM Security². Clearly, it is in the interests of all ATM owners to protect their machines and their cardholders as far as is humanly possible. Since a vast number of ATMs are available and operational 24 hours a day, seven days a week, it is logical to expect that owners will ensure there is sufficient ambient light for cardholders to perform their transactions comfortably during the day and at night. Since customers will return regularly to machines where they feel safe and comfortable, it would simply not make business sense to provide inadequate ambient lighting for all installed ATMs which are operational through the night. Conversely, customers will "vote with their feet", especially at night, if they feel an ATM is not attractive and safe-looking.

The idea of a mandated standard legislating a minimum degree of illumination for ATMs may sound good in theory but it is both impractical and unenforceable. Will law enforcement officers then be required to walk around at night with light meters to inspect a base of installed ATMs numbering well over million and a quarter? This question illustrates the absurdity of trying to legislate on ATM lighting.

ATMIA stands behind the right of ATM owners and operators to employ free choice in their selection of security solutions and ATM technology.

ATM owners carry certain liabilities in terms of providing safe environments for ATM usage by customers and it is the opinion of the ATM Industry Association that any further legislation affecting outdoor ATM terminals would be unnecessary given that courts are already empowered to decide on liability issues arising from ATM security. Since the risk profile of different ATM sites varies significantly, and changes dynamically over time, it should be left to ATM security specialists and ATM owners to remain in control of their security strategies and security technology in our mature industry with its extraordinary track record of service over more than three decades.

^{1[1]} The ATM Industry Association is a non-profit trade association serving all businesses and groups in the ATM industry. The association is made up of several hundred members in more than 30 countries. We currently represent over one million ATMs internationally. For more information go to – www.atmia.com and www.globalasa.com.

² GASA's best practices are available online to all ATMIA and GASA members under password-protection, for security purposes; non-members may obtain copies once approved by ATMIA