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In October 2025, Visa released revised Network Operating Rules (“*Rules*”) that materially alter the requirements and expectations of how the ATM industry operates. Effective with the publication of the revised Rules, the following sections have been added and revised. Any capitalized terms in the following sections have the meaning as defined in the Rules.

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#### Rule 6.2.4.2 ATM Operator Agreement Requirements

- **Effective 18 October 2025** In the US Region: An ATM Operator agreement must include language that an ATM Operator does all of the following
  - Not knowingly submit any Transaction that is illegal or that the ATM Operator should have known was illegal
  - Validate the locations of all ATMs and maintain detailed records, including the date of the last address verification
  - Make the following available to Visa upon request
    - ATM fleet inventory
    - Electronic journal records
    - Any other data requested by Visa
  - Permit the ATM Acquirer or Visa, either itself or through an agent, conduct financial and procedural audits and general reviews at any time
  - Provide Visa the right to limit or terminate the ATM Acquirer’s agreement with the ATM Operator or the ATM Operator’s agreement with the Agent
  - Require its Agents comply with the Visa Rules
- **Effective 18 October 2025**, in the US Region: An ATM Operator agreement must include language that an ATM must disburse cash to a Cardholder in the local currency and is only owned, leased, controlled, or sponsored by banks, savings and loan associations, and credit unions.

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#### Rule 6.2.4.3 Acquirer Requirements for ATM Operators

- **Effective 18 October 2025** In the US Region: An ATM Acquirer must comply with all of the following:
  - Conduct appropriate due diligence of an ATM Operator, including verifying the locations of ATMS to ensure the ATM Operators and Agents are not engaged in any activity that could cause harm to the Visa Brand. If suspicious or unusual activity is identified, Visa may request a physical inspection of the ATM site.
  - Ensure that its ATM Operator and Agent maintain records of ATM data for each ATM, and make it available to the ATM Acquirer or to Visa upon request, including all of the following:

- The location of all ATMS, including sponsored ATMs and the date of the last address verification
- ATM specifications, including make, model, PCI-compliant keypad details, and software version
- ATM electronic journal records, including the following:
  - Account transfers
  - Balance Inquiries
  - Bill sequencing, if available
  - Cash balance and loads
  - Cash deposits and withdrawals
  - Receipt paper replenishment
- Any other data request by Visa
- Ensure that the ATM Operator uses the appropriate MCC and other required indicators to identify an ATM Cash Disbursement Transaction, as specified in the Rules (added).

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#### Rule 6.2.5.1 ATM Acquirer Processing

- **Effective 18 October 2025**, in the US Region: An ATM Acquirer must conduct an adequate due diligence review of an ATM Operator, including a site visit or a suitable alternative, to ensure compliance with the Acquirer's obligation to submit only legal Transactions to VisaNet.

The complete Rules are available on [Visa.com](https://www.visa.com).

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#### Frequently Asked Questions:

##### 1. How do these Rules impact my daily operations?

The impact of the changes in the Rules may require changes to your contractual relationship with your customers. None of these Rules are optional and must be implemented.

You are responsible for verification and validation of the sites where the ATMs are located, including but not limited to the make, model, and specification of the ATM itself, along with the current address location of that ATM.

Electronic journals, as defined in the Rules, must be enabled on each ATM in order to be compliant under the Rules.

##### 2. What role does Switch Commerce have under these new rules?

After publication of these Rules, Switch Commerce has had discussions, both internally and with various sponsor banks, regarding the requirements under the Rules and the best practices and expectations for implementing the Rules.

Although we continue to engage with our sponsor banks, customers, and partners, we will continue to provide best practices and requirements under these new Rules.

**3. Are the electronic journal requirements under the Rules different from the electronic journals that I currently use?**

The short answer is yes. The current electronic journals are used for representations in a cardholder dispute and are currently optional for your ATMs. The electronic journals, as defined in the Rules, include information that is not currently necessary for a representment under a Reg E dispute, and the electronic journals are mandatory.

**4. Can Switch Commerce store an electronic journal that is compliant with the Rules?**

Once the Rules were published, Switch Commerce conducted a review of the messages it receives from ATM terminals to create a storage system compliant with the Rules. During this assessment, it was discovered that the receipt paper replenishment is not currently passed along in any of the messages. Switch has reached out to the terminal manufacturers to inquire whether this information is available in any message, and if not, the timeline for implementation.

Switch has had discussions on this issue with the sponsor banks and will work with them and the manufacturers in order to bring a resolution to this issue so that Switch can receive and store electronic journals that meet the requirements under the Rules.

**5. How long are these electronic journals stored?**

Following discussions with the sponsor banks, the current requirement is 5 years.

**6. When should I start enabling the electronic journals on my ATMs?**

We understand that visiting the terminals is a time-consuming process; however, this process is required under the Rules. These new Rules are currently in effect, so we strongly recommend that you immediately enable electronic journals on all your ATMs.

Switch Commerce will start implementing this feature in its Terminal Management System by changing the electronic journal from optional to mandatory. This will allow Switch Commerce to start receiving electronic journals as soon as it is enabled on each of your terminals.

**7. What happens if I do not enable electronic journals on my ATM or my ATM is not capable of sending electronic journals?**

In conversations with our sponsor banks, failure to enable electronic journals will result in a compliance issue under the Rules, which may require suspending services at any non-compliant ATM until the electronic journals are enabled. We

will continue to notify you of your portfolio's progress in bringing your ATMs into compliance with these Rules.

Switch Commerce will also update its terminal configuration information to assist with this process. Of course, if you have any questions, please contact the Switch Commerce Partner Support team or the ATM terminal manufacturer for information on how to enable electronic journals.

#### **8. What information do I need to compile for the address verification?**

Currently, the Terminal Management System stores the location address. However, we are continuing to discuss these subjects with the sponsor banks because this is an evidence-based requirement rather than a simple representation that the information entered into our Terminal Management System is correct. The purpose of this rule is to verify exactly where the ATM is currently located and that it is dispensing cash in the local currency.

We anticipate that some form of photos of the terminal inside the location address, along with performing a transaction, will be required to validate the terminal identification number at a particular location. We will continue to communicate the expectations as we continue these discussions with our partners.

#### **9. How does address verification happen with event, seasonal or mobile ATMs?**

Any time an ATM changes location, the address must be updated within our Terminal Management System to the current location, and any address validation process must be done each time that ATM location changes.

#### **10. What is an Illegal transaction as defined in the Rules?**

Illegal transactions can take many forms; however, the most notable illegal transactions are cashless ATMs. **For avoidance of doubt, cashless ATMs are not allowed to be processed on Switch Commerce. Any suspicion of a cashless ATMs at any location will result in the suspension of services to that terminal and, potentially, the termination of any agreement with Switch Commerce.**

In order for a transaction to be considered an ATM transaction, it must automatically dispense local currency from the ATM.

If your terminal only provides a receipt and does not automatically dispense cash, it is not compliant with the Rules and is not an ATM transaction.

If your terminal automatically dispenses anything other than local currency (in this case, United States dollars), it is not an ATM transaction.

**Any transaction that does not meet the requirements above as an ATM transaction is not allowed to be submitted to Switch Commerce. Switch Commerce would deem any submission of non-compliant transaction as an illegal transaction and will immediately suspend services to that ATM.**

**Switch Commerce reserves its right to terminate any terminal or any relationship that submits an illegal transaction to Switch Commerce under the Rules.**

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We understand that any changes to the Rules lead to uncertainty and an unexpected burden of compliance. The team at Switch Commerce has spent considerable time and effort working with our sponsor banks to obtain their views on how to most efficiently implement these Rules. Our work is still ongoing, and we continue to engage our partners to leverage the tools and technology Switch Commerce is known for to help bring your terminals into compliance.

We appreciate the relationship that we have with our customers and partners. Part of this relationship is providing you with the information and assistance necessary to manage your ATM portfolio. We understand the challenges that you will face with the implementation of the changes to the Rules and will continue to provide you with the information on how your portfolio is progressing with this implementation.