



December 14, 2018

Via Electronic Submission

Re: Docket No. OP-1625 – Potential Federal Reserve Actions to Support Interbank Settlement of Faster Payments, Request for Comments

The American Transaction Processors Coalition (ATPC) has taken into consideration the feedback from its member institutions, who in turn have engaged with the Federal Reserve (Fed), The Clearing House (TCH), NACHA, and several clients to understand their respective positions regarding the Fed's request for comment on being an operator for a new real-time payment type.

At this time, we feel as if solutions exist in the marketplace for all size financial institutions that integrate with TCH Real-Time Payments (RTP).

If the Fed does conclude that financial institution (FI) adoption will require their involvement, then we feel strongly that the new Fed real-time payment type MUST be delivered by 2021; delays beyond this timeframe would slow down U.S. adoption.

Regarding the Fed's proposed liquidity management and 24x7x365 settlement services, the ATPC agrees these initiatives would progress faster payments in the U.S. and are pre-requisites to the Fed becoming an operator.

Signed,

A handwritten signature in black ink, appearing to read "H. West Richards", with a stylized flourish at the end.

H. West Richards

Executive Director

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