

December 13, 2018

Ann Misback Secretary, Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue, N.W. Washington, DC 20551

Re: Comment: Faster Payments System; Docket Number OP-1625

Dear Ms. Misback:

Frontier Bank is a Stock Thrift operating as a community bank in Sioux Falls, SD and in a number of rural towns in Northwest Iowa. Frontier is a member bank of SHAZAM, Inc. SHAZAM is a national member-owned debit network, processor and core provider, that has been deeply involved in leading the faster payments effort from the beginning. We support SHAZAM's participation, and we support SHAZAM's comments on this matter.

Briefly, Frontier Bank supports the development of a 24X7X365 Real Time Gross Settlement Service (RTGS) by the Federal Reserve System to provide equal and fair access to real-time payments and real-time settlement offering choice and flexibility. We believe the Federal Reserve System operation of RTGS is essential to community banking. The alternative is for large institutions to operate and control a rapid payments system, which we believe would not be in our best interest.

Frontier Bank supports the development, by the Federal Reserve System, of liquidity management tools for banks dealing with 24X7X365 settlement issues. Our reasoning is the same. The Federal Reserve System will provide clear and consistent rules for deployment of new liquidity tools, which we believe would be in our best interests.

Thank you for considering our comments.

Sincerely,

George K. Schneidermann

Board Chair