

May 8, 2020

Board of Governors of the Federal Reserve System Attn: Ann E. Misback, Secretary 20th Street and Constitution Ave NW Washington, DC 20551

In Re: Regulation D Interim Final Rule (RIN 7100-AF 89; Docket Number R-1715)

To Whom It May Concern,

RCB Bank ("Bank") is writing in response to the Board of Governors of the Federal Reserve System's ("Federal Reserve") Interim Final Rule regarding changes to Regulation D.

RCB Bank wishes to convey support for the <u>permanent</u> deletion of numeric limits on certain kinds of transfers and withdrawals made from "savings deposit" account types. The limitations previously imposed presented numerous operational challenges, in addition to customer confusion and hardships.

Bank customers will certainly benefit from the Federal Reserve's willingness to amend outdated regulations to address advances in technology. Financial services technology has advanced greatly in recent years and has afforded customers the ability to make transfers on-the-go and at will, as simply as with a text message. However, the numeric limit on some transfer types would prevent, if not penalize, customers for taking advantage of such conveniences.

About RCB Bank

RCB Bank is an Oklahoma-owned and operated bank with assets totaling more than \$3.2 billion and 60 locations across Oklahoma and Kansas. The Bank operates in four (4) Metropolitan Statistical Areas ("MSAs"), with special focus on organic and acquisition-based growth.

Founded in 1936, RCB Bank is committed to serving its communities with conservative banking practices and progressive banking products. We strive to build stronger communities by helping local businesses with their financing and cash management needs. We help build neighborhoods by

making it possible for homebuyers to buy, build or renovate property. We give back to our community through our donations and personal involvement with area schools, local organizations and civic groups.

Thank you for your consideration.

Respectfully, retMartin

Daniel Marlin SVP, Senior Operations Officer RCB Bank P.O. Box 189 Claremore, OK 74018

cc: Roger L. Mosier, President & CEO of RCB Bank Roger Beverage, President & CEO of the Oklahoma Bankers Association (OBA)