

**From:** "Charles Lee" <Charles.Lee@midfirst.com> on 03/26/2008 02:35:03 PM

**Subject:** Regulation D Reserve Requirements and Regulation I FRB Stock

March 26, 2008

Jennifer J. Johnson  
Secretary, Board of Governors of the  
Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, D.C. 20551

RE: Regulations D and I  
Docket No. R-1307

Ms. Johnson,

MidFirst Bank, a federally chartered savings association headquartered in Oklahoma, appreciates the opportunity to comment on the proposed amendments to Regulation D Reserve Requirements of Depository Institutions as published in the February 12, 2008, Federal Register. MidFirst strongly supports the elimination of the Regulation D three transaction limitation for certain savings account transactions. In so doing, the Federal Reserve proposes that all transactions from a savings deposit account that are subject to transaction limitations be limited, in aggregate, to no more than six per month or statement cycle. By establishing a uniform and consistent limitation applicable to all such transactions, the Federal Reserve is reducing regulatory burden, promoting operational efficiency, minimizing overhead costs, and implementing a mechanism more readily understood by both customers and institution employees. Further, the increase in permitted check and debit card transactions from three to six is a marginal increase that will have minimal effect on national monetary flows which is the reason the transaction limitations were originally established. If additional information is required, please contact the undersigned.

Sincerely,

Charles R. Lee  
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MidFirst Bank  
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