

From: First National Bank, Rozan Franklin

Subject: Reserve Requirements

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Comments:

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Proposal: Regulation D - Reserve Requirements of Depository Institutions

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Comments:

The subject proposal will allow correspondent banks to continue serving their community bank respondents through the establishment of an Excess Balance Account (EBA). However, there is one aspect of the amendments that creates concern for First National Bank. Under this change to Regulation D, participants in the EBA would be required to authorize only one institution to manage the EBA. Our community bank utilizes the services of multiple correspondent accounts (including the bankers bank and one or more traditional correspondent banks). Our bank strongly urges that the proposal be fine tuned to permit banks to use more than one institution for their EBA participation. We will be significantly affected by this proposal. Thank you for this opportunity to comment.