

From: State National Bank of Texas, Jack W. Alldredge

Subject: Reserve Requirements

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Comments:

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Proposal: Regulation D - Reserve Requirements of Depository Institutions

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Name: Jack W Alldredge

Affiliation: State National Bank of Texas

Category of Affiliation: Commercial

Address: 4301 Jacksboro Hwy

City: Wichita Falls

State: TX

Country: UNITED STATES

Zip: 76302

PostalCode:

Comments:

Action taken by the Fed to address unintended consequences resulting from implementation of payment of interest on reserves is appreciated. However, the proposal under Reg D to allow establishment of EBAs with only 1 correspondent bank does not match how community banks actually do business. Most banks maintain more than 1 correspondent banking relationship and this should be permitted in the proposal. I strongly urge you to allow community banks to utilize the services of more than one correspondent bank in establishing their EBA participation.