

VIA EMAIL: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)  
and cc: Bonnie Kankel @ IBAT

Subject Line: Docket No. OP-1232

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street & Constitution Ave NW  
Washington, DC 20551

Dear Ms. Johnson:

These comments are made under the regulatory burden reduction review of the Economic Growth and Regulatory Paperwork Reduction Act (“EGRPRA”) on behalf of the Independent Bankers Association of Texas (“IBAT”). IBAT is a trade association representing approximately 600 independent community banks domiciled in Texas.

This stage of EGRPRA involves board Regulations CC, J, S, D, O, and L. First, IBAT would observe that the commentary, which accompanies Regulation CC, provides extremely helpful examples and provides clarity to implementation of that regulation. Basically, our request would be that the Federal Reserve review the interpretive letters that have been issued over the years with regard to Regulation D and Regulation O in particular and convert those to a readily accessible commentary comparable to that used with Regulation CC. The older interpretive letters, many of which are still valid today, are not readily accessible on the Federal Reserve’s website. Accordingly, this important gloss is not available to assist community banks in their efforts to comply with these complicated regulations.

In addition, we would suggest that the Federal Reserve consider adding a summary to Regulation O that captures in chart form the limitations on loans to various types of insiders in an easy to grasp, comprehensive way. In addition, it would be beneficial if cross-references to Regulation W were included in that summary chart. Again, this would facilitate compliance on the part of the community banks.

With regard to Regulation D, we would respectfully suggest that the definition for “savings accounts,” found in Section 204.2(d), simply needs to be rewritten. As a trade association, IBAT receives questions from its members on regulatory matters. One of the common questions we receive is how to interpret the limitations on transactions in order to qualify an account as a savings account. The definition is extremely difficult to read because of its fractured syntax. In addition, important interpretive letters clarify when and how transactions effectuated by Internet and telephone should be included. Either this explanation should be in the regulation itself or in a commentary as suggested above.

Thank you for this opportunity to comment.

Sincerely,  
Karen M. Neeley  
General Counsel