

From: Bankers' Bank, Carita Phillips
Proposal: 1434 - Reg. J. (RIN No. 7100 AD 84) - Collection of Checks and Funds Transfers
Subject: Collection Of Checks And Other Items By Federal Reserve Banks And Funds Transfers Through Fedwire:

Comments:

Date: Dec 16, 2011

Proposal: Regulation J - Collection of Checks and Other Items by Federal Reserve Banks and Funds Transfers through Fedwire: Elimination of "as-of adjustments" and Other Clarifications
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Comments:

From: Bankers' Bank, Carita Phillips Proposal: Regulation J - Collection of Checks and Other Items by Federal Reserve Banks and Funds Transfers through Fedwire: Elimination of "as-of adjustments" and Other Clarifications [R-1434] Subject: Proposed amendments to Regulation J that would eliminate references to "as-of adjustments" consistent with the Board's proposed amendments to Regulation D to simplify reserves administration. Comments: Bankers' Bank appreciates the opportunity to comment on proposed discontinuing as-of-adjustments related to deposit revisions. We are very much in favor of the as-of adjustments being replaced by direct compensation entries. We would make the request that the debit or credit entry post directly to the routing number of the original transaction and the supporting documentation be forwarded directly to that depository institution. Final settlement of the entry should follow the Appendix 5 designation. And since we are on the subject, we would like to make an additional proposed change. currently the interest on excess balances for all of our respondent banks holding balances with the Fed, is posted as one lump sum to our account. It would be very helpful if the interest amounts were posted using the individual routing numbers of these institutions and supporting documentation forwarded directly to them. Again, final settlement of the entry should follow the Appendix 5 designation. Understanding that these are very detailed concepts and our correspondent relationship adds another level..we would welcome discussing any clarification needed. Thank you for the opportunity to share our thoughts with you. We welcome the implementation of these changes as soon as possible. Even given the small benefits these simplifications will create for us specifically as a Bankers' Bank, we still feel they are positive, necessary, and forward moving improvements. Sincerely, Carita Phillips