

From: Seaboard Federal Credit Union, Kyle W Casburn
Proposal: 1433 - Reg. D -(RIN AD83) - Reserve Requirements Of Depository Institutions:
Reserves Simplificatio
Subject: Proposed rules to simplify the administration of reserve requirements and reduce
administrative burd

Comments:

Date: Dec 20, 2011

Proposal: Regulation D - Reserve Requirements of Depository Institutions:
Reserves Simplification and Private Sector Adjustment Factor
Document ID: R-1433
Document Version: 1
Release Date: 10/11/2011
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Comments:

Ms. Jennifer J. Johnson, Secretary Board of Governors of the Federal Reserve System 20th Street & Constitution Ave., NW Washington, DC 20551 Dear Ms. Johnson, This letter represents the views of the Seaboard Federal Credit Union (SFCU) regarding the Federal Reserve Board's (the "Board") request for comments regarding its proposed amendments to Regulation D: Reserve Requirements of Depository Institutions: Reserves Simplification and Private Sector Adjustment Factor. By way of background, SFCU serves approximately 11,500 members in Eastern Maine. We strongly urge the Board to reconsider its Reg D six transfer/withdrawal limit on savings deposit accounts. Reg D (§204.2(d)(1)) currently limits the number of "convenient" transfers and withdrawals to no more than six per calendar month or statement period. SFCU does not believe that the current limits affect the Federal Reserve's ability to conduct monetary policy in any way, and without a doubt, is the most burdensome federal regulation for our members. The increased use of electronic and mobile channels allows our members to hit the 6 transfer in short order, with many members achieving this in the first business day of each month. Members do not understand why they cannot be allowed access to their own funds due to an archaic monetary policy mechanism. SFCU respectfully respects the Board to consider raising or better yet, eliminating the six transfer limitation on internal transfers (payments and deposits) made by consumers among their own accounts within the same financial institution. Sincerely, Kyle W. Casburn
President and CEO