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Subject: Regulation CC

Comments:

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Proposal: Regulation CC - Availability of Funds and Collection of Checks
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I would like to comment on the length of this proposal. As a Compliance Officer for a community bank, I feel that 500+ pages of proposed regulations is excessive and burdensome. While I agree and understand the need for clarification on the elimination of non-local checks and the incentive to have all banks return and receive checks electronically, this all could have been written in under 200 pages. Most Compliance Officers through out the country will read all 500+ pages because they want to get the regulation right and they are concerned they might miss something. However, with all of the regulatory changes coming down the road due to Dodd-Frank, the agencies need to do a better job in condensing their thoughts. If it can't be said in 200 pages or less, than you need to figure out a better way at communicating it to us. I believe the "spirit" of the Paperwork Reduction Act is violated when a proposed regulation is over 500 pages. The time it takes bank compliance personnel to read, analyze and implement a regulation at a bank is growing. This document does not help. Again, I am not disagreeing with the contents of the changes proposed to Reg CC. I am suggesting that regulation writers do a better job at condensing their ideas in the wake of many upcoming regulatory changes.