

From: W Cologne  
Subject: Regulation CC

---

Comments:

Date: Mar 28, 2011

Proposal: Regulation CC - Availability of Funds and Collection of Checks  
Document ID: R-1409  
Document Version: 1  
Release Date: 03/03/2011  
Name: W Cologne  
Affiliation:  
Category of Affiliation:  
Address:

City:  
State:  
Country:  
Zip:  
PostalCode:

Comments:

As the Reg CC specialist for a community bank I do not like the use of Reg CC as a means to encourage the electronic transmittal and collection of checks. The purpose of holding items is to reduce the risk of an item not being collected for the depository institution. In the present environment items that are not returned electronically can take 5+ days to make it back to the bank of first deposit. Shortening the period to 4 days ignores the fact that not all banks process electronically. The Fed should use other means to work towards total electronic check processing instead of this regulation and delay the shortening of the hold periods until this is complete.