From: Bank of Advance, Harold M Miles

Subject: Reg D, Q, & DD

Comments:

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Proposal: Regulation D, Q, and DD - Prohibition Against Payment of Interest on

Demand Deposits
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Name: Harold M Miles
Affiliation: Bank of Advance

Category of Affiliation: Commercial

Address: City: State:

Country: UNITED STATES

Zip:

PostalCode:

Comments:

Price controls, be it interchange on debit cards or interest rates on corporate checking accounts, should not be the subject of government regulation. Therefore, I am in favor allowing the implementation of Section 627 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which repeals Section 19(i) of the Federal Reserve Act. We welcome the opportunity to compete for corporate checking accounts without having to manipulate the current system by sweeping funds off our balance sheet into other investments products. We fund our loans with deposits. This change will provide an additional funding source for us to do so.