

From: Oregonians Federal Credit Union, Chuck Garner  
Subject: Regulation CC

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Comments:

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Proposal: Regulation CC - Availability of Funds and Collection of Checks  
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Comments:

The proposal to increase the amount of a deposited check that is to be made available--from \$100 to \$200-- increases risk for financial institutions. This is due to a major flaw with the premise of funds availability. The environment has changed a great deal since Reg CC was first implemented. Today fraud is much more prevalent due to computer software and printers that allow duplication and alteration of checks very easy and difficult to detect. One of the riskiest checks is the Cashier's Check, counter check or Certified check issued by financial institutions. These are fraudulently produced and presented daily. This check is on the list that is not to have holds placed on them. Increasing the amount of immediate advance and limiting hold times in today's environment is risky. Due to increased fraud the entire hold limits and process need to be revisited. There is a major disconnect in this reg. A check is either good or not good, not \$100 or \$200 of a check. The Reg needs to be adjusted to today's risky environment. Making it easier for people to get away with fraud is not in the public's best interest.