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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: Nov 04, 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: 12/31/1999
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Comments:

A great step toward simplifying Reg D for the benefit of consumers would be the removal of limitations on internal transfers made by consumers between their own accounts at the same financial institution. It's very difficult for members to understand the distinction between which transactions "count" and which don't, such as an online transfer vs. an ATM transfer. Enabling members to freely transfer their funds between their own accounts, at the same financial institution, would simplify this reg, make it more logical and ease the tracking burden currently placed on consumers and institutions. Thank you for your consideration.