



Payment Systems

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November 1, 2012

Mr. Robert deV. Frierson, Secretary,
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Re: FR 3066a

Dear Mr. Frierson:

Branch Banking and Trust Company and its affiliated banks and subsidiaries of BB&T Corporation (“BB&T”) appreciate the opportunity to comment on the Board of Governors of the Federal Reserve System’s (the “Board”) planned Depository and Financial Institution Payments Survey FR-3066a (“Survey”). BB&T has participated in the Board’s Surveys for a number of years and recognizes the value of the Survey data to both the Board and other retail payments systems participants, including BB&T.

As of September 30, 2012, BB&T is one of the largest financial services holding companies in the U.S. with \$182.0 billion in assets and market capitalization of \$23.2 billion. Based in Winston-Salem, N.C., the company operates approximately 1,850 financial centers in 12 states and Washington, D.C., and offers a full range of consumer and commercial banking, securities brokerage, asset management, mortgage and insurance products and services. A Fortune 500 company, BB&T is consistently recognized for outstanding client satisfaction by J.D. Power and Associates, the U.S. Small Business Administration, Greenwich Associates and others. More information about BB&T and its full line of products and services is available at www.BBT.com.

Our comments on specific components of the proposed Survey are noted below:

Survey Reference Period

We strongly support the Board’s plan to use March 2013 as the Survey reporting period. Reducing the reporting period to a single month, versus the two consecutive months used in previous Surveys, will simplify the response process for most participants with no significant impact on the quality and validity of Survey results.

Mr. Robert deV. Frierson, Secretary,
Board of Governors of the Federal Reserve System
Re: FR 3066 a
November 1, 2012
2

Full Service Transactions Accounts vs. Prepaid Card Accounts

BB&T believes the primary distinguishing characteristic between full service transaction accounts and prepaid cards accounts is that the former allow unlimited check-writing access by the account holder and prepaid card accounts do not.

Active Cards Outstanding vs. Number of Accounts with Recent Card Activity for credit, debit and prepaid card accounts

We believe it will be more feasible and useful for the Survey to request the number of active cards outstanding for credit, debit and prepaid cards.

Time period for payment or transaction history in determining if a credit, debit or prepaid card is “active”; types of transactions to be counted toward activity

For debit and prepaid cards, signature or PIN purchase transactions occurring within the most recent 30 days should be counted toward activity. For credit cards, only payment, purchase, cash advance or balance transfer transactions occurring within the most recent 90 days should be counted toward activity. Credit cards should have the longer 90 day time period because they tend to have less frequent activity than debit or prepaid cards.

Debit and Prepaid Card Cash Back Transactions

BB&T is able to report the number and value of cash back transactions for debit cards, but is not able to provide this information for prepaid cards.

Except as noted above, we anticipate being able to provide the information requested in the Survey.

As a final note, we urge the Board to provide clear instructions and definitions along with the Survey to ensure respondents have an accurate understanding of the information being requested, and also to help ensure consistency among Survey responses. The Board should also consider holding conference calls after the Survey is distributed where Board staff can review the Survey and instructions and respondents can ask questions. Some areas of potential confusion are noted below:

- Transaction accounts – Some financial institutions may consider savings accounts to be transaction accounts.
- Card – Are credit, debit and prepaid accounts accessed by a non-card form factor, such as a token, NFC chip, mobile device, etc., to be considered “card accounts”?
- Credit Card – Are charge cards, which require payment in full each billing cycle, to be reported as credit cards?
- Debit Card – Are so called “decoupled debit cards”, which can be issued by a financial institution other than the financial institution that owns the related transaction account, to be reported in the Debit Card category? Are cards that are issued primarily for ATM access, but that can be used for PIN (but not Signature) purchases, to be reported in the Debit Card category?
- ATM – Should respondents report only those ATM cash withdrawals made at their own ATMs, or should cash withdrawals made by a respondent’s debit and prepaid cardholders at foreign ATMs be included?

Mr. Robert deV. Frierson, Secretary,
Board of Governors of the Federal Reserve System
Re: FR 3066 a
November 1, 2012
3

- Wholesale Vaults – Is reporting of cash deposits and withdrawals at wholesale vaults limited to just those operated by the reporting financial institution, or is it meant to include those made a wholesale vaults operated by third parties?

Thank you for your consideration of our comments, and please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph S. Blount", with a long, sweeping horizontal stroke extending to the right.

Joseph S. Blount
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