



6705 Sugarloaf Parkway, Suite 200
Duluth, GA 30097
(770) 476-9625 • (800) 768-4282 • (770) 497-9534 (Fax)



Submitted via email: regs.comments@federalreserve.gov

February 10, 2014

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

Re: Collection of Checks and Other Items by Federal Reserve Banks and Funds Transfers through Fedwire; Time of Settlement by a Paying Bank for an Item Received from a Reserve Bank (Regulation J; Docket No. R-1473

Dear Mr. Frierson:

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the Fed's proposed changes to Regulation J. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 138 Georgia credit unions that have more than 1.9 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

As we stated in the separate comment letter that we filed today on the Fed's proposed changes to its Payment System Risk Policy, while GCUL appreciates that the Fed is looking to improve the payments system, we do have some concerns that credit unions could be negatively impacted by the proposed changes.

A major concern we have for both proposals is that, by finalizing these rules many financial institutions, especially smaller ones, will need to increase their account balances with the Federal Reserve to settle items (i.e. presented checks for this rule and ACH items for the other proposed rule). The increase in account balances could provide an unnecessary hardship on the smaller institutions.

Again, if the rule is finalized, we ask the Federal Reserve to minimize the costs and impact to credit unions, corporate credit unions, and other payment providers that may be affected by these changes. We would ask the Fed to provide additional information and resources for all affected financial

institutions. Furthermore, we would ask the Fed for an effective date of six months to a year to allow sufficient time for financial institutions to make the necessary changes to implement the rule.

GCUL appreciates the opportunity to present comments on behalf of Georgia's credit unions in regards to Payment System Improvements. Thank you for your consideration. If you have questions about our comments, please contact Selina Gambrell or Cindy Connelly at (770) 476-9625.

Respectfully submitted,

A handwritten signature in cursive script that reads "Selina M. Gambrell". The ink is dark and the signature is fluid and legible.

Selina M. Gambrell
Compliance Specialist