

ZIONS BANCORPORATION

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July 2, 2015

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

ATTN: Enhancements to Federal Reserve Bank Same-Day ACH Service; Docket No. OP-1515

Members of the Board:

On behalf of Zions Bancorporation ("Zions"), we wish to thank the Board of Governors of the Federal Reserve System (the "Board") for providing us with the opportunity to comment on the proposed enhancements to the Federal Reserve Banks' ("Reserve Banks") same-day automated clearing house ("ACH") service. Zions is a \$55 billion bank holding company with OCC- and FDIC-supervised banking offices located in Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, Texas, Utah, Washington, and Wyoming.

The same-day NACHA rule change allows originating depository financial institutions ("ODFIs") and their ACH originators the option to send same-day ACH transactions to accounts at all receiving depository financial institutions ("RDFIs").

- We support the same-day rule as approved by NACHA's voting members.
- We support the requirement that all RDFIs must receive same-day ACH transactions in order to create ubiquity in the industry.
 - We believe optional RDFI participation in same-day ACH service will result in a lack of participation from financial institutions not seeing an intrinsic value in the service.
 - It is critical to have unanimous support of all financial institutions and operators in the network in order to achieve ubiquity and to add value for businesses and consumers.

The same-day NACHA rule change also incorporates an interbank fee paid by the ODFI to the RDFI. The interbank entry fee will help offset the RDFI's implementation and ongoing support of receiving these transactions.

- We support the Reserve Banks' adoption and administration of the interbank fee as approved by NACHA's voting members.
 - The interbank fee is inseparable from mandatory RDFI participation. ODFIs would have a choice to offer the new same-day origination services, while RDFIs would be required to receive these transactions and settle funds two additional times a day.

- As an RDFI, the interbank fee would diminish the cost recovery for the investments we will have to make into same-day ACH.

Businesses and consumers continuously look for ways to make payments faster through relatively economical means. Same-day ACH achieves this goal, and provides an additional product solution in the payments marketplace to support the needs of businesses and consumers. Also, there are many competing forces in the payments space today, and supporting same-day ACH would help financial institutions remain competitive. If the Board does not adopt the proposed enhancements, investments to modernize the ACH network won't be made, and financial institutions will lose competitiveness in the payments marketplace.

We encourage the Board's full support for same-day ACH, and to take the next step to move the payments industry forward into faster ACH payments and simultaneously adding value.

Sincerely,

Norman Merritt
EVP – Corporate Compliance Director
Zions Bancorporation