

July 27, 2016

VIA website <http://federalreserve.gov/apps/foia/proposedregs.aspx>

Ref: Docket No.: R-1564

RE: Proposed Amendments to Regulation CC

On behalf of the EPCOR Board of Directors, Members and staff, thank you for the opportunity to provide input on the proposed amendments to Regulation CC. The Federal Reserve's interest in gaining industry opinion on this topic is greatly appreciated.

EPCOR members feel the current differentiation between altered and forged are well known industry standards. Including the use of evidentiary presumption may require institutions to increase the expense to store documents currently being destroyed in a presumed reasonable time as they have embraced the ability to move items electronically via image capture. Questions were also raised as to if an image replacement document allowed with Regulation CC Subpart D would qualify if evidentiary presumption was adopted. Concerns were expressed by several members related to the operational impact of the Bank of First Deposit to detect when an item was forged. Many EPCOR members expressed interest in adding additional time such as five days for the return of altered or forged items.

EPCOR members generally agreed that forged checks are a more common method of fraud versus altered checks.

Most EPCOR members support the idea of including the "Date" field in a claim of an altered item.

Thank you again for the opportunity to comment on this important issue.

Sincerely,



Wendy Wishon, AAP, NCP
Senior Vice President
EPCOR