



The Community Bank of Otter Tail County!

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November 29, 2018

Ms. Ann Misback, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue NW  
Washington, DC 20551

Reference: Docket No. OP-1625

Dear Ms. Misback,

Purpose for writing today is in regards to the above referenced. On behalf of First National Bank of Henning and its Board of Directors we feel it is imperative the Federal Reserve play a pivotal role in faster payments and not abdicate their role to the largest banks. We view for community banks this type of system will equate to fair and equal access to real-time payments and real-time settlement. Offers choice and flexibility in the faster payment arena. This is essential for community banks continued success.

In addition we view the Fed's role of providing the means to manage liquidity during non-business hours for faster payments. We also desire the Fed to state what faster payment roles they intend to play along with an estimated timeframe to allow vendors and banks to prepare.

Finally it's our desire for the Federal Reserve to continue to listen to industry groups and create services what are neutral to all banks regardless of size. Additionally the Federal Reserve's willingness to allow Correspondent Banks, like United Bankers Bank, to act as agents for community banks in the faster payments arena, enabling them to improve payment flow and facilitate settlement, especially during non-business hours.

Kind Regards,



James A. Espeland

President & CEO

First National Bank of Henning Ottertail & Battle Lake  
Henning, MN 56551

