



Corporate Federal Credit Union

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November 15, 2018

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

RE: Docket No. OP-1625

Board of Governors:

Alloya Corporate Federal Credit Union (“Alloya”) would like to thank the Federal Reserve Board (“FRB”) for considering potential actions to support interbank settlement of faster payments.

We believe the FRB facilitation role and guaranteed settlement between counterparties are keys to a safe, ubiquitous faster payments environment in the United States. As a large correspondent representing over 1,500 credit unions, Alloya is in favor of the real-time gross settlement (RTGS) solution coupled with a flexible liquidity management tool. The proposed solution would support 24x7x365 payments activity and enable smaller financial institutions to more readily participate in the faster payment’s marketplace.

We appreciate the FRB’s willingness to consider these solutions and to seek comments on potential actions. If you have questions or concerns regarding Alloya’s review and support of these proposed actions, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in blue ink that reads 'Todd M. Adams'.

Todd M. Adams  
Chief Executive Officer

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