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Credit Union Association

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Ann Misback
Secretary, Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.,
Washington, DC 20551

On behalf of the members of the MD|DC Credit Union Association and the 125 Credit Unions and their 2.2 million members that we represent, we appreciate the opportunity to comment on the Federal Reserve's Request for Comments Re: 12 CFR Chapter II Docket No. OP – 1625 Potential Federal Reserve Actions to Support Interbank Settlement of Faster Payments.

Since 1909 Credit Unions have strived to provide financial guidance and security to the members and communities we serve. We embrace the credit union philosophy of "people helping people" in all that we offer. Unfortunately, as the Credit Union movement has evolved to serve our members in the most effective and efficient ways possible, the Federal Reserve's payment system has failed to progress with new technology. This inefficient system harms all Americans, to include our members, and should be addressed.

As Sen. Chris Van Hollen (MD) wrote in his August 28 letter to Federal Reserve Chairman Jerome Powell "The United States' outdated payment system imposes significant and unnecessary costs on Americans, leading consumers to incur billions of dollars a year in fees associated with the delayed movement of funds. These costs are primarily borne by the millions of American families who live paycheck-to-paycheck, while they are rarely, if ever, applicable to wealthier families who never approach the lower bounds of their bank account." We fully support Sen. Van Hollen's sentiments urge the Federal Reserve to act. Many of these problems could simply be avoided if the United States had a faster payment system like many other countries. It is unacceptable that we are lagging.

The MD|DC Credit Union Association is in full support of a faster payments system that is accessible to all institutions and all Americans. We always appreciate the invitation to comment and look forward to continued dialogue.

Sincerely,

John Bratsakis
President/CEO MD|DC Credit Union Association