



NORTH AMERICAN BANKING COMPANY

July 11, 2019

Ann E. Misback
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
regs.comments@federalreserve.gov

Re: Request for comment on Docket No. OP-1664, Potential Modifications to the Federal Reserve Banks' National Settlement Service and Fedwire® Funds Service

Dear Ms. Misback:

On behalf of North American Banking Company, I would like to express our support of the Federal Reserve Board's proposal to extend the operating hours of the National Settlement Service (NSS), which we believe will enable more financial institutions to provide same-day ACH to a larger portion of their customer base.

As I stated in my letter of December 18th supporting RTGS the Federal Reserve should continue to enhance all payment product types of service that they provide. Expanded Same Day ACH processing windows is one of those enhancements, multiple Same Day ACH can produce near real time results without the expense of real time systems.

Another improvement is the expansion of settlement services via extended National Settlement Service (NSS) operating hours is a well-documented industry priority and is long overdue. My processing customers located in the western part of the country are unduly burdened and would benefit from expanded operating hours.

While there is some additional risk for some institutions' evening operations due to "end-of-day compression," ultimately it is worth the effort to extend the operating hours of NSS and Fedwire and to implement changes to mitigate those risks. Over the long run, these changes will better position financial institutions for ongoing improvements in the payment system, including mitigation of other types of risk.

The majority of the industry spoke through the Faster Payments Task Force report, it is time to make these much needed improvements to the FRB payments services.

Sincerely



Michael A. Bilski
Chief Executive Officer

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