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December 10, 2018

Via Email: regs.comments@federalreserve.gov

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

Regarding Docket No. OP-1625, Interbank Settlement of Faster Payments

Cornhusker Bank management appreciates the opportunity to comment and support the Federal Reserve Bank's initiative on faster payments. As a community bank with \$600 million in assets, we fully support the Federal Reserve's involvement in a Real-Time Gross Settlement (RTGS) system. We believe the Federal Reserve has the capability to reach and equitably serve financial institutions with a secure and fair system regardless of their size and locations.

Here is a list of the benefits we foresee in having the Federal Reserve play a lead in the development of a RTGS system:

- Ability to keep bank transaction records private and not used by a private corporation or financial institutions for data mining.
- Ability to set fair and equal access for all participants.
- Ability to set reasonable pricing for participation no matter the institutions size
- Ability to provide liquidity management tools and systems
- Ability to create private data systems for fraud management without fear that the data could be used for unintended purposes.

The Federal Reserve has a long history of providing a safe, flexible, and stable financial system. We support the Federal Reserve playing a leading role in the evolution of a faster payment system as proposed in the October 3, 2018 Federal Register Notice.

If you have any further questions or would like to discuss our comments, we would be happy to meet.

Sincerely,



Perry E. Haralson
Chief Financial Officer