December 6, 2018

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

Re: Potential Actions to Support Interbank Settlement of Faster Payments
Docket No. OP - 125

Dear Ms. Misback:

Thank you for the opportunity to present comments on whether the Federal Reserve Bank(s) should develop a 24x7x365 payment settlement service and whether they should also develop a liquidity management tool that would enable transfers between Federal Reserve accounts on a 24x7x365 basis to support real-time interbank settlement of faster payments regardless of whether those services are provided by the private sector or the Reserve Banks.

I support a payment system that would enhance speed, while maintaining a safe and efficient system for all users. The current faster payment solution for large bank exchange would not work effectively for smaller banks (under $10B), since smaller banks do not have the resources to fit all the pieces together to form a cohesive network. A fundamental role the Federal Reserve plays in ensuring a safe, robust payment system regardless of delivery method. Community banks would be left out of the solution if only provided within the large bank network, so the Federal Reserve’s continued and expanded involvement is key to the future of community banks.

Thanks again for this opportunity to make these supportive comments.

Sincerely,

Leonard R. Wolfe,
President/Chairman