

Proposal: 1625 Potential FR Actions to Support Interbank Settlement of Faster Payments
Description:

Comment ID: 132989

From: Prairie Bank of Kansas, Misty Harter

Proposal: 1625 Potential FR Actions to Support Interbank Settlement of Faster Payments

Subject: OP-1625 -Potential Federal Reserve Actions to Support Interbank Settlement of
Faster Payments

Comments:

Date:Dec 07, 2018

Proposal:Potential Federal Reserve Actions to Support Interbank Settlement of Faster Payments [OP-1625]

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First name:Misty

Middle initial:D

Last name:Harter

Affiliation (if any):

Affiliation Type: ()

Address line 1:200 S. Main St.

Address line 2:

City:Stafford

State:Kansas

Zip:67578

Country:UNITED STATES

Postal (if outside the U.S.):

Your comment:December 7, 2018

Ann Misback, Secretary

Board of Governors of the Federal Reserve System

20th Street and Constitution Avenue, N.W.

Washington, DC 20551

Re: OP - 1625 Potential Federal Reserve Actions to Support Interbank Settlement of Faster Payments, Request for Comments

To Whom It May Concern:

Prairie Bank of Kansas supports the Federal Reserve as a developer and operator of a 24x7x365 RTGS settlement service.

Prairie Bank of Kansas also supports the Federal Reserve as a developer and operator of a liquidity management tool to support the 24x7x365 real-time interbank settlement of faster payments.

As a community bank, we believe the emerging faster payments ecosystem will only obtain ubiquity and interoperability if the Federal Reserve develops and operates the settlement rails.

If development of a faster payment network is left to current market influencers, the nation's largest banks will govern its design and build it based on their big-bank model. Consequently, as transactions migrate to available faster payments systems and away from traditional ACH, Check, Cash, or Wire Transfer channels, community banks would likely see deposits similarly erode at a devastating pace. We encourage the Federal Reserve to promptly arrive at a decision that favors community banks and immediately begin development of a faster payments RTGS settlement solution.

Sincerely,

Misty Harter, AAP

Vice President of Operations

Prairie Bank of Kansas