December 14th, 2018

The Jerome H Powell.
Chair
Board of Governors of the Federal Reserve System.

VIA ELECTRONIC SUBMISSION: regs.comments@federalreserve.gov


Dear Chair Powell:

Thank you, for once more have the opportunity to comment on the critical situation of the slow payments systems in our country.

Our faster payment services will have deposit account primary at the FED to hold funds associated with their customers' balances and further rely on our interbank payment systems for the movement of money between their customers' bank accounts and service-specific accounts. (No liability)

All our faster payment services involving transfers between bank accounts and their final customers are done “instantaneous” in real time on a 24x7x365 basis. The RGTS Interbank and inter-customers are instantaneous and originated in any mobile device or computer. (MoMo proposal The Fastest Payment Task Force March 2017)

MoMo solution is already deployed in El Salvador and our goal is to have an US “pilot” in operation for Q1 2019. Our intentions are to have the opportunity to do this pilot with the FED through the Faster Payment Task Force or any other FED division.

Sincerely Yours.

Randolph Kantorowicz-Toro
CEO.