

05/01/2019

Ms. Ann E. Misback  
Secretary, Board of Governors  
Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue NW  
Washington, DC 20551

***Re: Comments on Regulation D: Reserve Requirements of Depository Institutions***

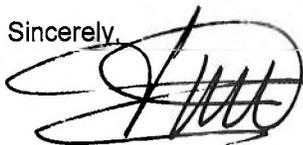
Dear Ms. Misback:

I am writing on behalf of SchoolsFirst Federal Credit Union (SchoolsFirst FCU), which serves school employees and their family members in California. We have more than 880,000 Members and over \$15 billion in assets. SchoolsFirst FCU appreciates the opportunity to comment on the Board of Governors of the Federal Reserve System's (Board's) proposed rulemaking on Regulation D: Reserve Requirements of Depository Institutions.

SchoolsFirst FCU believes that Pass-Through Investment Entities (PTIEs) should be prohibited from being considered an authorized entity under Regulation D as they do not advance the purpose of the Federal Reserve System of providing the nation with a safe, flexible, and stable monetary and financial system since they are not subject to the supervision of a federal banking agency. We agree with the Board's concerns of the potential negative impact PTIEs would have on monetary policy implementation and financial market stability.

Thank you for the opportunity to comment on this proposed rulemaking. We feel that our feedback will help the Board continue to provide the regulation and supervision needed to promote a safe and sound financial system.

Sincerely,



Francisco Nebot,  
Chief Financial Officer  
SchoolsFirst Federal Credit Union

Cc: Credit Union National Association (CUNA)  
California/Nevada Credit Union League (CCUL)