



6061 W Interstate 10 San Antonio, TX 78201

800-688-7228

CreditHuman.com

July 15, 2019

Ann E. Misback  
Secretary, Board of Governors of the FRS  
20<sup>th</sup> St. and Constitution Avenue NW  
Washington, DC 20551

RE: Docket No. OP-1664

Dear Ms. Misback:

On behalf of Credit Human Federal Credit Union I'm writing in response to your notice and request for public comment submitted to the federal register on May 16, 2019, regarding *Potential Modifications to the Federal Reserve Banks' National Settlement Service and Fedwire® Funds Service To Support Enhancements to the Same-Day ACH Service and Corresponding Changes to the Federal Reserve Policy on Payment System Risk.*

Credit Human is a \$3.1 billion, member-owned, low income designated, financial cooperative serving over 230,000 members residing across the country. We have over 700 employees primarily located in Texas, North Carolina, and Washington State.

In response to your request for comment, let me first begin by stating that Credit Human fully supports the Faster Payment movement and appreciates the flexibility each Financial Institution has in determining what will be or not be originated as a same-day ACH. The current time frames works for our membership; thus, we do not currently believe that extended cutoff times and closing times are necessary.

Should the Federal Reserve choose to extend the Fedwire® Funds Service and National Settlement Service, we would have an increase in operational cost due to increased staffing. We would also suffer a delay to our end-of-day and overnight system processes making us vulnerable to a delay in opening the following day. For these reasons, we do not believe modifications should be made to the current system.

Should the Federal Reserve choose to make an adjustment, we would suggest not to add a new 3<sup>rd</sup> submission window but rather change the existing 2:45 PM ET submission window to a 3:45 PM ET while keeping the 5:00 PM ET settlement time. This would decrease the time between submission and settlement from 2 hrs. 15 minutes to 1 hr. 15 minutes, allowing institutions in the east and central timeframes to maintain their current processing schedule and the west coast institutions, or any financial institution that choose to submit a same-day ACH one additional hour.

Thank you for this opportunity to comment and for your consideration in this matter. Should you have any questions or concerns, please feel free to contact me.

Sincerely,



Yvonne De La Rosa-Flores  
Regulatory & Legislative Affairs Officer  
Credit Human