



July 15, 2019

Via Real-time Electronic Submission

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

regs.comments@federalreserve.gov

Re: Docket No. OP-1664

Dear Ms. Misback:

Financial Innovation Now (“FIN”)¹ appreciates the opportunity to submit this comment letter to the Board of Governors of the Federal Reserve System (the “Fed”) in response to the notice and Request for Comment regarding the proposed extension of daily operating hours for the National Settlement Service and corresponding extension of daily operating hours for the Fedwire® Funds Service.

FIN supports the proposed extension of daily operating hours for Same Day ACH and believes it will bring substantial benefits to consumers and small businesses that use the ACH Network. FIN members are technology companies that offer a wide variety of consumer peer-to-peer payment applications and card payment processing, as well as small business products and services, including payments, inventory management, accounting and tax software, analytics, and online/offline commerce logistics. These services, along with FIN internal business operations and those of our partners and customers, can be made more accessible and useful through a third Same Day ACH processing window.

FIN strongly urges the Board to act as soon as possible in issuing a final rule, without further delays.² If it is to continue adequately serving the economy and consumers, the U.S. payments system needs to evolve in many ways.

Technology companies are increasingly enabling a wide array of economic activity to occur, on a second-by-second basis, among consumers, businesses, and workers. A modern, *real-time* payment infrastructure is particularly important for those individuals and businesses seeking to avoid higher-cost credit alternatives. While FIN strongly supports the Fed operating a real-time gross


¹ FIN is an alliance of technology leaders working to modernize the way consumers and businesses manage money and conduct commerce. Our member companies include Amazon, Apple, Google, Intuit, PayPal, Square, and Stripe. For more information regarding FIN’s policy priorities and principles, please visit www.financialinnovationnow.org.

² FIN and many other stakeholders have already supported an expansion of Same Day ACH. See <https://financialinnovationnow.org/wp-content/uploads/2018/01/fin-nacha-same-day-ach-comment-1.26.18.pdf>

settlement service,³ FIN agrees that the expansion of Same Day ACH must continue separately on its own.

Longer operating hours for Same Day ACH will better support the payment needs of both consumers and businesses, for both credit and debit payments moving in and out of depository accounts. The ACH system is uniquely ubiquitous, connecting to all bank accounts across the country today, a critical alternative to credit and debit card networks with the surety that a payment can reach all bank accounts. The Fed must continue to support and enhance the ACH system and keep up with the needs of consumers and businesses. FIN appreciates the opportunity to comment on the proposed rule changes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. Peters", with a stylized flourish at the end.

Brian Peters
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³ See Comments of Financial Innovation Now, Potential Federal Reserve Actions to Support Interbank Settlement of Faster Payments, 83 Fed. Reg. 57351 (November 15, 2018), available at <http://financialinnovationnow.org/wp-content/uploads/2018/12/fin-fed-real-time-payments-docket-op-1625-final.pdf>