



July 11, 2019

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

RE: Docket No. OP-1664

Dear Ms. Misback,

On behalf of the hundreds of thousands of members we serve, RBFCU appreciates the opportunity to provide comments 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 ("NSS") and corresponding extension of daily operating hours for the Fedwire Funds Service (the "Request").

RBFCU is supportive of the proposed modifications to the NSS and Fedwire operating hours to facilitate a third daily Automated Clearing House (ACH) processing window. The new same day settlement window, scheduled for implementation March 19, 2021, is contingent upon a prompt adoption of the Request by the Fed.

A third same day settlement window will allow RBFCU to offer expanded same day benefits to members, primarily through retail payments. The Request serves as a positive incremental approach to the infrastructure required to support a 21st century payment system, ideally operating on a near 24x7 schedule. The ACH rail is an attractive vehicle for faster retail payments, and RBFCU's relatively slow adoption of same day processing is in part due to unassured and unhurried enhancement of the NSS. RBFCU has explored alternative, more expensive, payment mechanisms to offer our members true same day payment services. As a not-for-profit financial cooperative, RBFCU encourages improvements to the payments system that better position our ability to serve our members and their communities.

Austin
512-833-3300

San Antonio
210-945-3300

Toll-free
1-800-580-3300

rbfcu.org

P.O. Box 2097, Universal City, Texas 78148-2097



The Request requires minimal technological changes and limited one-time technological costs of implementation. The most significant cost appears to involve additional workforce coverage and training. We are unaware of reasons "end-of-day compression" would affect our robust end of day procedures. Anticipated changes to the daylight overdraft rate would not materially affect RBFCU. In fact, the risks and costs theoretically associated with the Request are, at a minimum, countervailed by the expanded timeframe for clearing and settlement of positions. The expansion reduces several types of ACH payment risk, including credit risk, settlement risk, and operational risk. Therefore, the net risk/reward favors implementing the Request.

RBFCU thanks you for the opportunity to provide comments in response to the Request. We are happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in cursive script, reading "Sonya McDonald".

Sonya McDonald
Executive Vice President
Randolph-Brooks Federal Credit Union

Austin | San Antonio | Toll-free
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