



# PaymentsFirst

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*PaymentsFirst is Members First!*

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July 11, 2019

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

Re: Docket OP-1664

PaymentsFirst welcomes the opportunity to respond to the *Request for Comment* on potential modifications to the Federal Reserve Banks' National Settlement Service and Fedwire Funds Service to support enhancements to the Same-Day Automated Clearinghouse (ACH) Service.

PaymentsFirst is a Payments Association serving approximately 700 Financial Institution members in the Southeast. The majority of our members are small to mid-size institutions. We support the proposal of the Federal Reserve Board of Governors' to extend its settlement service and extended hours to facilitate Same-Day ACH enhancements. We believe the low cost ACH batch processing system is a great opportunity for many use cases for our members to take advantage of and better compete in a very competitive market. We polled our membership with NACHA's proposed Rule change for adding the new later window and the large majority of our members responded to our survey in favor of the change. Based on that feedback and the feedback from our staff, we are confident in our support of this Request for Comment.

Thank you again for the opportunity to respond on behalf of the PaymentsFirst membership.

Regards,

Peggy Gachesa / CEO / 678.384.9791

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