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June 29, 2020

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

**Re: Regulation D: Reserve Requirements of Depository Institutions Docket No. R-1715;
RIN 7100-AF 89**

Dear Ms. Misback:

On behalf of the 240 credit unions doing business in Illinois that in turn serve 3.5 million consumers, we submit the following comment concerning the above-captioned rulemaking of the Federal Reserve System (Board).

The Illinois Credit Union League strongly supports the Board's decision to amend its Regulation D to delete the numeric limits on certain kinds of transfers and withdrawals that may be made each month from "savings deposits," and appreciate the Board's intent to allow depository institutions customers/members more convenient access to their funds and to simplify account administration for depository institutions.

Prior to the rule, Regulation D limited the number of certain convenience kinds of transfers or withdrawals that an account holder may make from a "savings deposit" to not more than six per month. In addition, Regulation D imposed requirements on depository institutions for either preventing transfers in excess of the six-transfer limit or for monitoring such accounts for violations of the limit.

Suspending the six-transfer limit will provide credit unions more flexibility in serving members by allowing an unlimited number of convenient transfers and withdrawals from their savings deposits, furthermore, it will eliminate confusion the transfer limit posed to members.

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We suggest the Board provide clarity in its final rule that the deletion of the numeric limit is a permanent change. Further, we recommend the Board remove any ambiguous requirements regarding the interplay between Regulation D and Regulation CC.

On behalf of Illinois credit unions and their 3.5 million members, thank you for your consideration of our comments. If you have any questions, please do not hesitate to contact the undersigned at 630-983-2723.

Sincerely,

Joni Senkpeil

Illinois Credit Union League

By: Joni Senkpeil, SVP Member Solutions