



May 7, 2020

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

**Re: *Comments on Regulation D Interim Final Rule - Docket Number R-1715;  
RIN 7100-AF 89***

Dear Secretary Misback:

CrossState Credit Union Association (CrossState) is a regional advocacy organization that represents 516 credit unions with approximately 5.3 million members located in the Commonwealth of Pennsylvania and the State of New Jersey.

Pennsylvania and New Jersey were states severely impacted, and continue to be impacted, by the COVID-19 pandemic. Our credit unions continued throughout the pandemic to develop creative solutions to assist their members who may have been financially impacted by the pandemic, while balancing the need to operate in a safe and sound manner.

CrossState previously advocated for the elimination of the numeric limit on convenient transfers from savings accounts. We sincerely appreciate the actions of the Board in amending Regulation D to delete the requirement, and the promptness of the Board to address the needs of credit unions and other financial institutions. The elimination of the six convenient transfers limit will permit credit unions to serve their members more efficiently and allow members to better manage their finances without being burdened about how many transfers they conducted throughout the month. We do ask the Board to issue a statement to clarify that the elimination of the transfer limits is a permanent change. This will help to alleviate any uncertainty as credit unions make changes to account agreements, policies, and procedures.

CrossState is also grateful for the reduction of the reserve requirement to zero percent. This enables credit unions to use more of their capital to assist members through these trying times. However, we are mindful that the reduction of the reserve requirement to zero percent may not be permanent. We do urge the Board to issue guidance or clarification on how long the zero percent may remain in place, how much notice credit unions could expect if reserve requirements were to increase, and how the re-introduction of a reserve requirement would be structured if most accounts are now capable of being classified as transaction accounts or savings deposit.

Ann E. Misback, Secretary

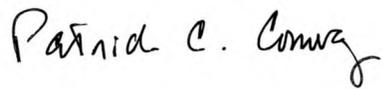
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Again, thank you for acting so quickly to help credit unions assist their members through these unprecedented and challenging times.

Thank you for the opportunity to comment.

With best regards,

A handwritten signature in black ink that reads "Patrick C. Conway". The signature is written in a cursive style with a large, stylized initial "P".

Patrick C. Conway  
President & CEO