

AMERICAN BANKERS ASSOCIATION, ET. AL., STEPHEN KENNEALLY

Proposal and Comment Information

Title: Request for Information and Comment on Reserve Bank Payment Account Prototype, OP-1877

Comment ID: FR-2025-0083-01-C17

Subject

Docket No. OP-1877 Extension Request

Submitter Information

Organization Name: American Bankers Association, et. al.

Organization Type: Organization

Name: Stephen Kenneally

Submitted Date: 01/12/2026

To whom it may concern:

Please find the attached letter from the American Bankers Association, America's Credit Unions, Bank Policy Institute, Consumer Bankers of America, Independent Community Bankers of America, NACHA, and The Clearing House seeking a 30 day extension to the comment period regarding the Request for Information on Payment Account Prototypes. We seek a new due date of March 2, 2026 to allow for the most comprehensive responses.

Thank you for your consideration.

Stephen Kenneally
SVP, Payments
American Bankers Association
(101) 663-5147

We are sending you this e-mail primarily for your information, to meet your needs and further our valued relationship. If you prefer not to receive any further messages from us, just reply to this e-mail and let us know. Thanks.

American Bankers Association 1333 New Hampshire Ave NW Washington DC 20036



January 12, 2026

Via Electronic Mail

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

Re: Request for Extension of Comment Period Deadline with Respect to the Request for Information and Comment on Reserve Bank Payment Account Prototype (RFI) Docket No. OP-1877

Dear Ms. Misback:

The American Bankers Association, America's Credit Unions, Bank Policy Institute, The Clearing House, Consumer Bankers of America, Independent Community Bankers of America, and Nacha respectfully request that the Federal Reserve Board (the "Board") extend by 30 days the current February 6, 2026, deadline for public comments on its Request for Information and Comment on Reserve Bank Payment Account Prototype.

The Associations are concerned that the existing comment deadline will not provide sufficient time to perform the level of analysis that the RFI warrants, particularly given the RFI's issuance during the holiday period.

For these reasons, the Associations respectfully request that the Board extend the deadline for comments on the NPR for at least an additional 30 days, with a new deadline for public

comments of no earlier than March 2, 2026. Our goal is to develop carefully considered and well-informed comment letters that will be constructive for the Board in accomplishing its goal of ensuring the payment system remains safe and secure.

Thank you for your consideration of this request. Please contact Stephen Kenneally with ABA at (202) 663-5147 if you have any questions.

Sincerely,

American Bankers Association

America's Credit Unions

Bank Policy Institute

The Clearing House

Consumer Bankers Association

Independent Community Bankers of America

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