

SYMEON DIONYSIS

Proposal and Comment Information

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

Comment ID: FR-2025-0083-01-C22

Submitter Information

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January 15, 2026

Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Re: Docket No. OP-1877 — Request for Information and Comment on Reserve Bank Payment Account Prototype

Dear Ms. Misback:

I write to oppose the request submitted by the American Bankers Association and other trade associations (the “Associations”) seeking to extend the comment deadline for the Board’s Request for Information and Comment on Reserve Bank Payment Account Prototype (the “RFI”) from February 6, 2026 to no earlier than March 2, 2026.

The Board has a strong interest in maintaining an orderly, predictable administrative process and avoiding unnecessary delay where the record can be developed within the timeframe already provided. The Associations’ submission does not provide a sufficiently particularized basis to justify altering the established schedule. Their stated rationale is generalized—asserting only that additional time is needed to perform analysis “particularly given the RFI’s issuance during the holiday period.” Standing alone, that assertion does not demonstrate why the existing deadline is unreasonable for sophisticated, well-resourced organizations that regularly participate in federal rulemakings and information requests.

Moreover, the request is internally inconsistent in ways that underscore the absence of a clear, fact-based showing. The Associations ask the Board to “extend by 30 days” but simultaneously request a deadline of “no earlier than March 2, 2026,” which does not cleanly correspond to a 30-day extension from February 6, 2026. The letter also appears to reference an “NPR” when the matter at issue is an RFI. These discrepancies are not merely stylistic; they suggest the request was not supported by the kind of concrete scheduling, analytical, or logistical detail that would normally warrant modifying the public timetable.

Granting an extension would also impose real costs on other stakeholders. The RFI concerns access to and design of payment account prototypes—issues with broad implications for competition, operational risk, and the safe and efficient functioning of the payment system. The market benefits from timely clarity and progress. Extending the deadline without a compelling, specific justification would prolong uncertainty and defer the Board’s ability to evaluate the record and move forward.

Finally, to the extent any commenter requires additional time to refine positions, that need can be addressed through established practice: commenters can submit timely initial comments and, where appropriate, supplement them with additional detail or data later—particularly where the initial filing clearly identifies the issues and the nature of any forthcoming support. The Associations’ stated goal of developing “carefully considered and well-informed” letters does not require delaying the entire docket.

For these reasons, I respectfully request that the Board deny the Associations’ request and maintain the current February 6, 2026 comment deadline.

Respectfully submitted,

Symeon Dionysis