

INTERNATIONAL BANK OF AMHERST, LONNIE J. PRZYBYLSKI

Proposal and Comment Information

Title: Proposed Revisions to the Federal Reserve Policy on Payment System Risk and the Guidelines for Account and Services Requests, OP-1878

Comment ID: FR-2026-0013-01-C16

Subject

Docket No. OP-[1878]

Submitter Information

Organization Name: International Bank of Amherst

Organization Type: Organization

Name: Lonnie J. Przybylski

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NONCONFIDENTIAL // EXTERNAL

July 14, 2026

Benjamin W. McDonough
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

RE: Proposed Revisions to the Federal Reserve Policy on Payment System Risk and the Guidelines for Account and Services Requests [Docket No. OP-1878]

Dear Secretary McDonough:

I am Lonnie Przybylski, Vice President at the International Bank of Amherst, a community bank based in Amherst, WI that serves the residents, small businesses, and agricultural communities of rural central Wisconsin. I appreciate the opportunity to comment on the Board's proposal to establish a special-purpose payment account.

Community banks meet rigorous standards for capital, supervision, consumer protection, and deposit insurance. These requirements protect depositors, support responsible local lending, and help keep the payment system safe. By granting direct access to the Federal Reserve payment system to institutions that are not subject to the same prudential, supervisory, and community-focused requirements, the proposal extends the benefits of Federal Reserve access without the corresponding safeguards. It could also divert deposits and payment activity away from the community banks like mine that support local economic development.

I am also concerned about the risk to the payment system. Extending this access shifts critical responsibilities, including Bank Secrecy Act/anti-money laundering and sanctions compliance, onto entities that may have less oversight than banks.

If the Board proceeds, I urge it to adopt strong, mandatory guardrails: a low limit on account balances and on the number of accounts during an initial period; mandatory Bank Secrecy Act/anti-money laundering and sanctions compliance requirements for every account holder; clear off-ramps and ongoing review if risks emerge; and an explicit statement that a payment account is not a pathway to a master account. Access to the Federal Reserve's accounts and services should remain tied to strong prudential oversight.

Our bank plays an integral role in the vibrance of our community by prudently providing financial services, time, talent, and economic support to our customers, neighbors, and friends. I believe that providing a special-purpose payment account and direct access to the Federal Reserve payment system will effectively drain the capital resources that our community depends upon and introduce unnecessary risks from weak safeguards. I strongly urge you to oppose the creation of special-purpose payment accounts or "skinny" master accounts for institutions outside the traditional banking system.

Thank you for considering my views.

Respectfully,

Lonnie J Przybylski

Vice President

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