



Indiana Credit Union League
The association of Indiana credit unions

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:

The Indiana Credit Union League (ICUL) appreciates the opportunity to comment on the Interim Final Rule, Regulation D: Reserve Requirements for Depository Institutions. The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.6 million consumers.

ICUL and our member credit unions strongly support the Federal Reserve Board's (FRB) decision to delete the six-per-month limit on convenient transfers from the "savings deposit" definition. In a previous rule change, the FRB amended Regulation D to lower reserve ratios on transaction accounts maintained at depository institutions to zero percent. Eliminating the transfer limit from the definition of "savings deposit" was a logical next step. These changes allow credit unions more flexibility in providing services to members. Removing the numeric transfer limits makes sense, and in our view, was long overdue.

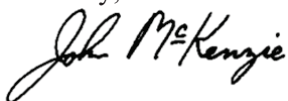
The interim final rule wording has created some confusion as to whether or not eliminating the transfer limits could be temporary. We recommend that the wording in the final rule be clear that the FRB intends that these changes be permanent. This will allow credit unions to make changes to their various disclosures without concern that the disclosures would need to be redone in the event these changes were temporary.

The FRB issued a Frequently Asked Questions document to clarify some of the items in the interim final rule that should also be addressed in the final rule. In addition to the permanence of this change, the following additional items should be addressed:

- Elimination of the transaction limits is not mandatory and is at the discretion of a financial institution.
- Financial institutions have flexibility on how report accounts (savings or transaction) on FR2900.
- The Reg D changes do not require a Truth-in-Savings and Reg E change-in-terms notice.
- The Reg D changes do not affect Reg CC transaction account definition.

We appreciate the opportunity to comment on the interim final rule. If you have any questions about our letter, please do not hesitate to give me a call at (317) 594-5320.

Sincerely,



John McKenzie
President, Indiana Credit Union League