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General

1. Are you in general agreement with the payment system gaps and opportunities identified in the "Payment System Improvement Public Consultation Paper"? Please explain, if desired.

Yes.

1i. What other gaps or opportunities not mentioned in the paper could be addressed to make improvements to the U.S. payment system?

2. Are you in general agreement with the desired outcomes for payment system improvements over the next 10 years? Please explain, if desired.

Yes.

2i. What other outcomes should be pursued?

3. In what ways should the Federal Reserve Banks help improve the payment system as an operator, leader, and/or catalyst?

Same Day ACH Settlement. A global FedWire System

Ubiquitous near-real-time payments

4. In discussions with industry participants, some have stated that implementing a system for near-real-time payments with the features described in the second desired outcome (ubiquitous participation; sender doesn't need to know the bank account number of the recipient; confirmation of good funds is made at the initiation of the payment; sender and receiver receive timely notification that the payment has been made; funds debited from the payer and made available in near real time to the payee) will require coordinated action by a public authority or industry group. Others have stated that current payment services are evolving toward this outcome and no special action by a public authority or industry group is required.

4i. Which of these perspectives is more accurate, and why?

I think regulation is required so all payment systems and providers are operating under the same rules and procedures. However, I do not believe that the CFPB needs to be involved. The FRB and the current regulations can be revised to meet the needs.

4ii. What other perspective(s) should be considered?

5. The second desired outcome articulates features that are desirable for a near-real time payments system. They include:

- a. Ubiquitous participation
- b. Sender doesn't need to know the bank account number of the recipient
- c. Confirmation of good funds is made at the initiation of the payment
- d. Sender and receiver receive timely notification that the payment has been made
- e. Funds debited from the payer and made available in near real time to the payee

5i. Do you agree that these are important features of a U.S. near real-time system? Please explain, if desired.

Yes.

5ii. What other characteristics or features are important for a U.S. near real-time system?

Training the consumer. Consumers are use to having the float of 2 - 3 days for checks and some debit/credit card transactions posting to their account. Consumer's will have to be educated, so they do not play the float and incurr unnecessary fees.

6. Near-real-time payments with the features described in the second desired outcome could be provided several different ways, including but not limited to:
- a. Creating a separate wire transfer-like system for near-real-time payments that leverages the relevant processes, features, and infrastructure already established for existing wire transfer systems. This option may require a new front-end mechanism or new rules that would provide near-real-time confirmation of good funds and timely notification of payments to end users and their financial institutions.
 - b. Linking together existing limited-participation networks so that a sender in one network could make a payment to a receiver in another network seamlessly. This option may require common standards and rules and a centralized directory for routing payments across networks.
 - c. Modifying the ACH to speed up settlement. This option may require a new front-end mechanism or new network rules that would provide near-real-time confirmation of good funds and timely notification of payments to end users and their financial institutions. Payments would be settled periodically during the day.
 - d. Enhancing the debit card networks to enable ubiquitous near-real-time payments.
 - e. Implementing an entirely new payment system with the features described in the second desired outcome above.

6i. What would be the most effective way for the U.S. payment system to deliver ubiquitous near-real-time payments, including options that are not listed above?

ACH and debit/credit card networks would be effective to achieve the outcome. The wire transfer system is out dated and requires manual posting and verifications that would delay the real-time objective.

6ii. What are the likely pros and cons or costs and benefits of each option? What rule or regulation changes are needed to implement faster payments within existing payment processing channels?

ACH would need same day, real time settlement. Wire transfers would not be an option as they are manually created, verified and posted. The FRB FedWire system does not communicate directly with an FI's member/customer account to credit or debit the accounts. The core processor does not talk to FRB FedWire.

6iii. Is it sufficient for a solution to be limited to near-real-time authorization and confirmation that good funds are on their way, or must end user funds availability and/or interbank settlement take place in near-real time as well?

settlement would need to take place in near-real time as well to guarantee the funds are available and to prevent the consumer from over drawing the account.

6iv. Which payment scenarios are most and least suitable for near real-time payments? (B2B, P2P, P2B, POS, etc.)

P2P is the most suitable. Wire least suitable

7. Some industry participants have said that efforts to make check payments easier to use, such as by enabling fully electronic payment orders and/or by speeding up electronic check return information, will incrementally benefit the payment system. Others argue the resources needed to implement these efforts will delay a shift to near-real-time payments, which will ultimately be more beneficial to the payment system. Which of these perspectives do you agree with, and why?

Checks are from the stone age. I feel checks in general should be eliminated by the year 2020. As the senior citizens older than 70 die off so will check writing and processing. The current generation does not utilize checks let alone own checks.

8. How will near-real-time payments affect fraud issues that exist with today's payment systems, if at all?

If the accounts balances can be verified and debited in real time as a valid account number with funds this will prevent overdrafts. However, eliminating fraud will not happen. As systems become more sophisticated so will the fraudsters.

8i. Will near-real-time payments create new fraud risks? If yes, please elaborate on those risks.

No Fraud will always exists.

9. To what extent would a ubiquitous near-real-time system bring about pivotal change to mobile payments?

10. What would be the implication if the industry and/or the Federal Reserve Banks do not take any action to implement faster payments?

If the FRB and the US does not keep up with changing payment trends the US will fall behind the rest of the world. This will affect the ability of corporations and small business to conduct business in the global market. We will not be able to compete in the global economy.

10i. What is the cost, including the opportunity cost, of not implementing faster payments in the United States?

We will no longer be competitive in the world market

11. To what extent will the industry need to modernize core processing and other backend systems to support near-real-time payments?

There will be a need to update core processing, FRB FedWire, FedACH etc. However, currently these are constant changes to stay competitive, up to date with compliance and consumer needs.

11i. What is the likely timeframe for any such modernization?

I would estimate that this would need to be done quickly to stay competitive. Core processors and other system processing solutions would need to hire programmers to make this a priority. This would be a major project much like Y2K but could be done in 2 - 3 years.

12. Some industry participants suggest that a new, centralized directory containing account numbers and routing information for businesses and/or consumers, to which every bank and other service providers are linked, will enable more electronic payments. A sender using this directory would not need to know the account or routing information of the receiver.

12i. What are the merits and drawbacks of this suggestion?

The merits would be great if the sender would not need the receiver account number information to protect the privacy and confidentiality of the consumer/business information. However, a centralized directory would require superior fire walls, routers etc to prevent the fraudster from accessing the data base. If this data base were compromised it could wreak havoc on an individual and the system.

12ii. What is the feasibility of this suggestion?

Since individuals are constantly changing, closing and opening accounts, I do not see how it would be possible to keep the directory current.

Electronification

13. Some industry participants say that check use is an enduring part of the U.S. payment system and that moving away from checks more aggressively would be too disruptive for certain end users.

13i. Is accelerated migration from checks to electronic payment methods a high-priority desired outcome for the U.S. payment system? (Accelerated means faster than the current trend of gradual migration.) Please explain, if desired.

Yes. I feel ultimately moving from the check payment system will happen. It can be accelerated, just as requiring Federal Government Payment Recipients to register for ACH or a refillable debit card. As the older generation dies off so will check writing.

13ii. Should the Federal Reserve Banks establish a target for the percent of noncash payments to be initiated via electronic means, by a specific date? For example: "By the year 2018, 95% of all noncash payments will be made via electronic means." If Yes, what is the appropriate target level and date?

Yes.

14. Business-to-business payments have remained largely paper-based due to difficulties with handling remittance information. Consumer bill payments also are heavily paper-based due to the lack of comfort some consumers have with electronic alternatives. In addition, many small businesses have not adopted ACH for recurring payments due to technical challenges and/or cost constraints. The payment industry has multiple efforts underway to address these issues.

14i. To what extent are these efforts resulting in migration from checks to other payment types?

14ii. What other barriers need to be addressed to accelerate migration of these payments?

14iii. What other tactics, including incentives, will effectively persuade businesses and consumers to migrate to electronic payments?

14iv. Which industry bodies should be responsible for developing and/or implementing these tactics?

Cross-border Payments

15. To what extent would the broader adoption of the XML-based ISO 20022 payment message standards in the United States facilitate electrification of business payments and/or cross-border payments?

16. What strategies and tactics do you think will help move the industry toward desired outcome four - consumers and businesses have greater choice in making convenient, cost-effective, and timely cross-border payments?

There needs to be a way to expand the FedWire system to expand the border of the US the same as FedACH global payments. This will take time by working aggressively with other countries to develop a world wide payment system.

Safety

17. Payment security encompasses a broad range of issues including authentication of the parties involved in the transaction, the security of payment databases, the security of software and devices used by end users to access payment systems, and security of the infrastructure carrying payment messages.

17i. Among the issues listed above, or others, what are the key threats to payment system security today and in the future?

Groups such as annoyous and other groups will continue to be a treat. Including terroist organizations.

17ii. Which of these threats are not adequately being addressed?

I do not believe biometrics is the way to protect systems. Soon we will have people being injured or killed for their biometrics.

17iii. What operational or technology changes could be implemented to further mitigate cyber threats?

I am not an IT person

18. What type of information on threat awareness and incident response activities would be useful for the industry?

18i. How should this information be made available?

19. What future payment standards would materially improve payment security?

19i. What are the obstacles to the adoption of security-related payment standards?

20. What collaborative actions should the Federal Reserve Banks take with the industry to promote the security of the payment system from end to end?

21. Please share any additional perspectives on U.S. payment system improvements.

