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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?

The ACH payment rails are the most likely candidate for handling such payment processes without having to re-create a totally new payment system. However, significant roadblocks lie ahead in the rulemaking process. Too many players have too many agendas for their own benefit. The Fed needs to take full control of the payment system and move it forward post haste.

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?

The Federal Reserve should take a stronger leadership role in the promotion of new payment mechanisms and not depend on trade groups and other groups whose priorities may be tainted by their own self interest.

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?

The former, waiting on the market itself to create a surviving method means that implementation may not occur until the middle part of the 21st century before a particular

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?

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?

Utilizing the wire transfer system would be costly and cumbersome. It is not designed for high volume activity. Utilizing the ACH system seems to be the most likely method for reaching the desired goal. In order to be able to use ACH more effectively new rules would have to be established for real time payments, along with incentives for major originators to participate. In order to relieve liquidity pressures on all originators the Fed would have to begin posting the origination entries for both debits and credits simultaneously, rather than the 2 1/2 hour delay built into the system today.

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?

Wires - not able to handle high volume, low dollar transactions effectively Linking system - limited participation amongst financial institutions ACH - see response above Debit Cards - these systems are not easily modified to accept credits. These systems depend on the ACH system for posting credit information. Creating a new payments network would be extremely expensive and time consuming.

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?

The former.

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

B2B most P2P most P2B least POS least

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?

The latter, any attempt to spend significant resources on payment systems like checks which are nearing the end of their useful life is a waste of resources.

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

I believe it may actually reduce fraud, since people who utilize near real time transactions will constantly be monitoring their accounts, rather than on a periodic basis.

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

No

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

Most young people use their phones for everything they possible can today. Putting together a near real time transaction system that is available for use in the mobile environment would be adopted much more quickly.

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

The payment system would continue to meander its way through many different permutations, stops, starts, failures and successes. The system needs a definitive direction. We already trail most of the civilized world in payment systems and need to take steps to catch up.

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

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

The core systems will be need to be able to take in hourly updates from the ACH systems.

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

It all depends on the deadlines set by the Fed. If you leave to the core providers they will never do it, they will just keep paying dividends to their shareholders. The Fed is the only entity that can pull this off.

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?

Very difficult to put this one together. I see many privacy issues.

12ii. What is the feasibility of this suggestion?

Slim and none.

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. ACH rules need to be cleaned up to encourage more electronic activity.

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. 0.85

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?

Limited success.

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

There need to be disincentives for processing checks, ie pricing, availability, etc.

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?

Unknown

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?

Don't know

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?

No comment

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

No comment

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

[Con comment](#)

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

[No comment](#)

18i. How should this information be made available?

[No comment](#)

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

[No comment](#)

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

[No comment](#)

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?

[No comment](#)

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

