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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.

**It is a well thought out paper but lacks the consistency with all users utilizing the system to achieve one outcome which is to get the money in real time! The system needs to be instantaneous due to new technologies & not be out dated & obsolete. A major overhaul needs to be implemented asap to stop the massive fraud that is occurring in all banks.**

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

**You guys do a good job but that is where I would have to stop, good and only good. Strive for great and you will become great! Good luck.**

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

**No. 10 years is way too long. The banking industry alone will lose millions if it takes you 10 years to get to real time!**

2i. What other outcomes should be pursued?

**The banking industry needs leadership not cronyism. Wake up!**

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

**It needs to be a leader not a follower which is what has happened in the last 20 years! Wake up!**

### **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?

**Public authority is needed in today's business world due to misguided greed and corruption.**

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

**Think ahead of the market and become something that businesses admire versus ridicule.**

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?

**All systems need to be connected with a moderator to control & monitor problems.**

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?

**Use new technology versus old and change regulation to reduce time & energy and improve efficiency.**

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?

**Both should be simultaneous**

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

**All scenarios need to be coded to process at the same speed.**

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?

You need to eliminate checks. You are still thinking old school. Its time to change. Remember courts accepting photocopies verse originals, it took them 20 years to adapt. You are following their same timeline..

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

It should reduce fraud 90% if the system is set up correctly. Avoid the Obamacare system..

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

Yes. There should be no problems if everyone is on the same page and on the same network..

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

To the extent that it has the technology that real time businesses use.

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

Massive fraud and losses will be shared by everyone.

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

millions of dollars lost..

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

Everyone needs to move towards the future. The cost needs to be minimal so everyone can afford to participate.

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

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?

Great idea but need controls and alerts in place to maintain & monitor.

12ii. What is the feasibility of this suggestion?

50% failure rate, your govt..

### **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. It is the future.**

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. 2014 98%**

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?

**Use scanners. Reuire all users to scan informaiton verse using paperwork.. It's time to grow up!**

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

**Be a leader not a follower!!**

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

**Reduce fees and make it profitable & faster!**

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

All industries. Everyone has a cell phone & computer! If not, give them one so they can grow up!

### **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?

50 50 on ISO. Streamline rules and regulations and everyone will follow.. Leadership!

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?

A great marketing plan..

### **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?

Know the ends and outs of your new technology! All avenues should be tracked to keep fraud to a minimal.

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

You are still behind the eight ball.

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

Hire and train right.

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

CA n go into detail later.

18i. How should this information be made available?

Will discuss later.

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

100% accuracy on data.

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

No obstacles just skepticism.

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?

Map the right path to the right future!

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



