



October 9, 2003

RE: CC-03-26; Automated Clearing House Use by Federal Agencies

- (1) *Do you agree with the addition of the new definition of "business check?"*  
**Yes, E & A Credit Union agrees with the new definition.**
  
- (2) *Does the proposed revised Accounts Disclosure strike the appropriate balance between the need for a shorter notice and the need to insure that members/consumers understand what is happening to their share drafts/checks?*  
**Yes, a shorter notice will be a benefit to both the consumer and the various agencies. E & A does not have a problem with the shorter version.**
  
- (3) *Do you agree with the expanded accounts receivable check conversion applications provision? Why or why not.*  
**Yes, E & A agrees with the expanded provision. It will save time if returns are necessary on the check.**
  
- (4) *Do you agree with the elimination of the regulatory prohibition against agencies converting to ACH debit entries certain types of payment instruments (such as money orders, traveler's checks, certified bank checks, and credit card checks) that are commonly received at lockboxes and points-of-purchase?*  
**Yes, E & A Credit Union agrees with the elimination of the regulatory prohibition.**
  
- (5) *Does the provision requiring financial institutions to notify an account owner of the receipt of a notice of reclamation "promptly" rather than "immediately" significantly reduce the burden on financial institutions?*  
**Yes, the change of wording to "promptly" will reduce the burden to E & A Credit Union.**

(6) *With regard to misdirected federal benefit payments, what is the most convenient and effective means by which this notice to agencies could be provided?*

**The best means by providing notice to the agency would be by an E-mail. However, faxing would also be a viable alternative.**

(7) *Do you feel it is appropriate to allow agencies to originate an ACH debit entry in order to collect a service fee related to an RCK entry if notice of the fee is given to the Receiver (member/customer) before the agency accepts the Receiver's check?*

**Yes, it is appropriate as long as the member is given notice when the check is given to the agency.**

(8) *Is the use of the R15 and R14 codes an efficient means of notifying agencies that the recipient of a federal benefit payment is deceased?*

**Yes, it is an efficient way to notify the agency that a member is deceased.**

(9) *With regard to misdirected federal benefit payments, what is the most convenient and effective means by which this notice to agencies could be provided?*

**The best possible way to notify the agency about a misdirected federal benefit payment would be by E-mail or by FAX.**

Thank You,

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