

The Huntington National Bank

Legal Department
Huntington Center
41 South High Street
Columbus, Ohio 43287



November 27, 2007

Via Electronic Delivery

John C. Dugan
Comptroller of the Currency
Office of the Comptroller of the Currency
250 E Street, SW
Public Reference Room, Mailstop 1-5
Washington, D.C. 20219
regs.comments@occ.treas.gov

Jennifer J. Johnson
Secretary, Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551
regs.comments@federalreserve.gov

Attention: OCC: Docket ID OCC-2007-0015
Federal Reserve: Docket No. OP-1294

Re: Notice of Proposed Guidance on Garnishment of Exempt Federal Benefit Funds
72 *Fed. Reg.* 55273 (September 28, 2007)

Dear Mr. Dugan and Ms. Johnson:

This letter is submitted on behalf of The Huntington National Bank (“Huntington”)¹ in response to the above-referenced Notice of Proposed Guidance published jointly by the Office of

¹ Huntington is a subsidiary of Huntington Bancshares Incorporated, which is a \$55 billion regional bank holding company headquartered in Columbus, Ohio. Along with its affiliated companies, Huntington has more than 141 years of serving the financial needs of its customers, and provides innovative retail and commercial financial products and services through over 600 regional banking offices in Indiana, Kentucky, Michigan, Ohio, Pennsylvania and West Virginia. Huntington, along with its affiliated companies, also offers retail and commercial financial services online at www.huntington.com; through its technologically advanced, 24-hour telephone bank; and through its network of over 1,400 ATMs. Selected financial service activities are also conducted in other states including: Dealer Sales offices in Arizona, Florida, Georgia, Nevada, New Jersey, New York, North Carolina, South Carolina, and Tennessee; Private Financial and Capital Markets Group offices in Florida; and Mortgage Banking offices in Maryland and New Jersey. Huntington’s affiliate, Sky Insurance, offers retail and commercial insurance agency services, through offices in Ohio, Pennsylvania, Michigan, Indiana, and West Virginia. International

the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and other federal banking agencies (collectively, the “Agencies”). We appreciate this opportunity to comment on the Notice.

We understand the Agencies’ concern to ensure that bank customers are better able to claim their exemptions in connection with garnishments of federal benefit funds. However, deputizing banks to raise exemptions on behalf of their customers when a customer’s account is garnished or subject to some other form of legal process is much more complex than might first appear, and adds significant cost and expense to a process that is already very costly for the bank, and all where the bank is not even a party to the dispute at issue. For example:

- There are multiple types of exempt benefits under the laws of the several states in addition to federal law.
- States have varying garnishment and other legal process procedures from one state to the next, including some states with one-time garnishment and other states with continuing garnishment, different notice requirements, and different periods of time within which to respond to the garnishment.
- There does not appear to be mandated standardized coding that the bank can necessarily rely on in information supplied to the bank with electronic direct deposits of funds representing benefit payments.
- There are no clear rules in most states or at the federal level resolving how far back in time the bank must conduct account research to determine exemptions or about how to determine exemptions when benefit funds are commingled with other funds, which they are the majority of the time.
- Some forms of garnishment or attachment may override exemptions, such as orders for child support or alimony.
- Garnishments are not the only form of legal process banks receive. For example, in addition to alimony and child support orders mentioned above, banks also receive state and federal tax levies, writs of execution, and unemployment levies for overpayments of state unemployment benefits.

Unfortunately, banks receive thousands of garnishments and other forms of legal process each month and have to act quickly and be very efficient with limited staffing resources in responding in order to avoid becoming liable to the issuing creditor for failing to hold or turn

over funds. It is often difficult or impossible to determine with certainty whether or not an account receives potentially exempt benefits, and even when that can be determined, the funds are usually commingled with funds from other sources or joint accountholders and very few states have any rules about how to apply exemptions in such cases. Most of the time, all the bank can do is wait the maximum time in turning over funds in response to the garnishment or other legal process to allow the consumer time to assert to the court any exemption or other claims the consumer may have. Banks are caught in the middle of these disputes between their customers and the creditors of their customers, and are not able to provide legal advice to their customers about exemptions nor are they in a very good position to evaluate their customers' claims of exemption in the face of clear liability of the bank to the creditor for not promptly turning funds over in response to the garnishment or other legal process.

With respect to the Agencies list of "best practices", we have the following comments:

- We believe that notification of customers when funds are held or removed from an account pursuant to a garnishment or other legal process (unless state law already provides that the creditor is required to provide notice to the customer) and restoration of funds or removal of holds when the account is no longer subject to garnishment or other legal process are standard practices. However, providing information to the customer about what types of benefits are exempt potentially involves the bank in providing legal advice which it is not able to do, except where the bank simply forwards to the customer a notice or form required by state law.
- With respect to "minimizing" the cost to the customer, we believe this is a customer service issue best addressed by each bank individually with its customers rather than the Agencies recommending or specifying bank practices with respect to pricing. When customers incur overdraft fees because they are not yet aware that funds have been held or removed pursuant to a garnishment or other legal process, we normally consider refund requests or even automatically reverse such charges. Once the customer is aware of the garnishment or other legal process, however, there is less reason to waive or reverse overdraft fees, again depending on the customer's specific circumstances as determined by the bank. Fees charged by the bank for processing the garnishment itself in our experience do not cover even a majority of the overall costs of processing garnishments and other forms of legal process, due in part to the large number of such garnishments or other legal process received where the bank either has no account or the account has no funds.
- With respect to the suggestion to offer segregated accounts, it is generally not feasible or possible to prohibit non-benefit deposits with respect to segregated accounts, and it is our expectation that very few (if any) customers would even want a segregated account that was restricted in this manner.

- The remaining “best practices” (with respect to determining what accounts contain exempt funds and what funds in such accounts may be exempt) do not appear to account for the complexities listed above that make it difficult or impossible to identify with certainty accounts with benefit funds or to identify what portion of an account balance constitutes exempt funds when benefit deposits are commingled with other funds. We believe that the only feasible practice here under most current circumstances is to delay turning over funds until the end of the required period under state law so as to give the customer more time to raise exemptions or other issues with the court.

One possible way in which the Agencies could be helpful with respect to the difficulties with identifying accounts that receive benefit funds would be to encourage the U.S. Treasury to require the government agencies sending funds to standardize the codes used in the “entry description” field in the batch header accompanying the individual detail records in ACH transmissions so that the receiving bank could reliably and with certainty identify and map such codes to one or more flags in the bank’s deposit or customer records that would show that the account receives benefit funds, and even perhaps what type of benefit funds are being received.² However, knowing that an account receives benefit funds still does not resolve the issues of how far back in time the bank must research the account or what to do if benefit funds are commingled with other funds.

Enclosed with this letter is a sample Huntington received on a recent day of “batch header codes” containin a “2” in the Originator Status Code denoting a government originator. These batch header codes were used by the originator to describe individual payments accompanying each batch header transmitted to Huntington by ACH that day. As is evidenced by the information in the “Description” column (which represents the “entry description” field in the batch header), there is an initial issue simply in determining which federal payments are exempt. For instance, there are three batch headers on the attached report that are from the Veterans Administration,³ and while only one of them appears to be protected from garnishment, it is impossible to be certain based on the information provided by the batch header codes. Similarly, there are three batch headers that appear to be for Social Security payments⁴ and one additional batch header that appears to be for Social Security supplemental income.⁵ While banks learn from experience that some of these codes are in fact for particular types of federal benefit payments, reliance on that type of experience will not pick up everything and will not eliminate the guesswork that must underlie any programming that relies on such codes as presently provided. Furthermore, it is our understanding that the content of the “entry description” field is whatever the sender puts there, and if changes are made to such codes, any previous programming by the receiving bank to pick up those codes would no longer do so. In

² This would not help with identifying benefit deposits in the form of paper checks.

³ The three batch headers show “VA ED CH30,” “VA MGIBSR,” and “VA BENEFIT,” appearing on lines 78-80, respectively, on the attached report.

⁴ See lines 75-77 on the attached.

⁵ See line 82.

John C. Dugan, Comptroller of the Currency
Jennifer J. Johnson, Secretary, Board of Governors of the Federal Reserve System
November 27, 2007
Page 5

order for codes to be part of the solution, all senders of exempt payments must adopt and use consistently a standardized batch header code that clearly identifies a payment as exempt and inform all depository institutions which codes apply to which exempt funds.

With respect to notifying customers of their potential exemptions, while banks are not able to provide legal advice to their customers, banks would be able to send to their customers a form of notice developed by the Agencies. Thus if the Agencies want to consider a best practice with respect to notice, we encourage the Agencies to develop such a standard notice or make information about exemptions available on Agency websites. However, even if banks send a standard notice provided by the Agencies, customers receiving the notice who have questions will most likely call the bank and ask questions about their exemptions which the bank is likely not to be able to answer, and such notices are likely to raise customer expectations that the bank is not able to satisfy.

It is not clear that there is anything the Agencies can do about the lack of national uniform rules (or even any rules in most states) to resolve the issues of how far back to research the account or what to do in the case of commingled funds. We understand that California and Connecticut have statutes that are helpful with respect to these issues, but it is our understanding that most states do not. If there were to be any federal statute modeled after the California or Connecticut or similar statute, it would have to clearly preempt state laws that would otherwise hold the bank liable for failing to turn over funds in compliance with any such federal statute.

Thank you for consideration of these comments. If you have any questions concerning these comments, or if I may otherwise be of assistance in connection with this matter, please do not hesitate to contact me at 614-480-5760.

Sincerely,



Daniel W. Morton
Senior Vice President & Senior Counsel

| | * | COMPANY NAME | | COMPANY # | SEC | DESCRIPTION | | | | STAT CODE | | * signifies the type of items in batch |
|---|-----|------------------|-------------------|------------|-----|-------------|--------|--------|-----|-----------|-----------------|--|
| 5 | 200 | DEPT OF EDUCATIO | DOED STUDENT LOAN | 9102000601 | PPD | STDNTLOAN | | 071120 | 324 | 2 | 101036990000001 | |
| 5 | 200 | DLSP | MBS BATCH | 1220040806 | PPD | MBS.DRAFT | 112007 | 071120 | 324 | 2 | 101036880000011 | = items in these batches could be |
| 5 | 200 | FAA TREAS 220 | 003050 | 111036183 | CCD | EDI MISC | | 071120 | 324 | 2 | 111036180058260 | debits or credits |
| 5 | 200 | FHWA TREAS 220 | 003050 | 111036183 | CCD | EDI MISC | | 071120 | 324 | 2 | 111036180058264 | some are definitely benefit payments; |
| 5 | 200 | GAO TREAS 220 | 003050 | 111036183 | CCD | EDI MISC | | 071120 | 324 | 2 | 111036180058257 | other may qualify as benefit payments |
| 5 | 200 | IRS | | 3387702000 | CCD | USATAXPYMT | 112007 | 071120 | 324 | 2 | 061036010000001 | (student loan proceeds??) |
| 5 | 200 | SAF/FMBMB | | 0000000001 | PPD | E111907 | | 071119 | 324 | 2 | 051036760000001 | |
| 5 | 200 | US TREAS - EAGLE | AL DHAFRA AFB | 3011736114 | PPD | CASH KIOSK | 071119 | 071120 | 324 | 2 | 011736110000170 | |
| 5 | 200 | US TREAS - EAGLE | AL UDEID AFB | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000128 | |
| 5 | 200 | US TREAS - EAGLE | ANACONDA | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000033 | |
| 5 | 200 | US TREAS - EAGLE | ARIFJAN | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000021 | |
| 5 | 200 | US TREAS - EAGLE | BUCA | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000061 | |
| 5 | 200 | US TREAS - EAGLE | FALCON | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000113 | |
| 5 | 200 | US TREAS - EAGLE | KNB | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000060 | |
| 5 | 200 | US TREAS - EAGLE | SLAYER | 3011736114 | PPD | CASH KIOSK | 071119 | 071120 | 324 | 2 | 011736110000079 | |
| 5 | 200 | US TREAS - EAGLE | STRIKER | 3011736114 | PPD | CASH KIOSK | 071119 | 071120 | 324 | 2 | 011736110000070 | |
| 5 | 200 | US TREAS - EAGLE | TAJI | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000094 | |
| 5 | 200 | US TREAS - EAGLE | TALIL | 3011736114 | PPD | CASH KIOSK | 071119 | 071120 | 324 | 2 | 011736110000136 | |
| 5 | 200 | US TREAS - EAGLE | VIRGINIA | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000027 | |
| 5 | 200 | US TREAS - EAGLE | WARRIOR | 3011736114 | PPD | CASH KIOSK | 071118 | 071120 | 324 | 2 | 011736110000079 | |
| 5 | 200 | US TREASURY | CASHLINK II | 1530133403 | CCD | FUNDS CONC | | 071120 | 324 | 2 | 051036510000001 | |
| 5 | 200 | US TREASURY 220 | 003050 | 20710001 | CTX | EDI MISC | | 071120 | 324 | 2 | 111036180058299 | |
| 5 | 200 | US TREASURY 310 | 003050 | 70060000 | CTX | EDI MISC | | 071120 | 324 | 2 | 101036150000078 | |
| 5 | 200 | US TREASURY0303 | | 3031036030 | PPD | SOC SEC | | 070503 | 324 | 2 | 031036030000012 | |
| 5 | 200 | Vafa TREAS 220 | 003050 | 111036183 | CTX | EDI MISC | | 071120 | 324 | 2 | 111036180058291 | |
| 5 | 220 | AGRI TREAS 310 | | 3101036009 | PPD | FED SALARY | 112007 | 071120 | 324 | 2 | 101036000000001 | |
| 5 | 220 | AGRV TREAS 310 | 720564834 | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000047 | = items in these batches are credits |
| 5 | 220 | ARC TREAS 312 | | 3121036500 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 121036500000033 | some are definitely benefit payments; |
| 5 | 220 | ARCF TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000070 | others are payroll and reimbursements; |
| 5 | 220 | BPD1 TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000032 | others are not distinguishable from |
| 5 | 220 | CBP TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000102 | Company Name, Description provided |
| 5 | 220 | CDC1 TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000196 | |
| 5 | 220 | CDC1 TREAS 310 | 1586051157 | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000093 | |
| 5 | 220 | CMWC TREAS 303 | | 3031036218 | CCD | MISC PAY | 112107 | 071121 | 325 | 2 | 031036210000000 | |
| 5 | 220 | COC1 TREAS 303 | | 3031036001 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 031036000000155 | |
| 5 | 220 | COM4 TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000107 | |
| 5 | 220 | DEA TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000098 | |
| 5 | 220 | DFAS-CLEVELAND | DO SYMBOL 8522 | 3041036004 | PPD | IATS PAY | 111907 | 071120 | 324 | 2 | 041036000000002 | |
| 5 | 220 | DFAS-CO | | 9044036412 | CTX | INVOICE | | 071119 | 324 | 2 | 044036410000001 | |
| 5 | 220 | DJ02 TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000068 | |
| 5 | 220 | DJ02 TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000071 | |
| 5 | 220 | DOJ TREAS 220 | | 3111036015 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 111036010000006 | |
| 5 | 220 | DOJ TREAS 220 | | 3111036183 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 111036180000007 | |
| 5 | 220 | DOLQ TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000124 | |
| 5 | 220 | EDUCATION | | 3051036366 | CCD | GAPS | 071119 | 071120 | 324 | 2 | 051036360000001 | |
| 5 | 220 | EPA TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000007 | |
| 5 | 220 | FA TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000037 | |

| | | | | | | | | | | | | |
|---|-----|------------------|------------|------------|-----|------------|--------|--------|-----|---|-----------------|--|
| 5 | 220 | FEMA TREAS 220 | | 3111036183 | PPD | MISC PAY | 112007 | 071120 | 324 | 2 | 111036180000000 | |
| 5 | 220 | GSA TREAS 220 | | 3111036183 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 111036180000022 | |
| 5 | 220 | GSA TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000181 | |
| 5 | 220 | GSA TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000052 | |
| 5 | 220 | HRSA TREAS 303 | 1520821668 | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000117 | |
| 5 | 220 | HUD TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000151 | |
| 5 | 220 | ID TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000080 | |
| 5 | 220 | ID TREAS 310 | | 3101036151 | PPD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000053 | |
| 5 | 220 | ID TREAS 310 | 1530197006 | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000064 | |
| 5 | 220 | IMMS TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000010 | |
| 5 | 220 | IRS TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000024 | |
| 5 | 220 | IRS TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000022 | |
| 5 | 220 | Just TREAS 303 | | 3031036001 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 031036000000136 | |
| 5 | 220 | NIH. TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000127 | |
| 5 | 220 | NPS TREAS 303 | | 3031036001 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 031036000000093 | |
| 5 | 220 | NRC TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000004 | |
| 5 | 220 | PAY MGT SYSTEM | | 3051036447 | CCD | HHS PAYMNT | 111907 | 071120 | 324 | 2 | 051036440000003 | |
| 5 | 220 | POD TREAS 312 | | 3121036500 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 121036500000017 | |
| 5 | 220 | RD TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000000 | |
| 5 | 220 | Stat TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000051 | |
| 5 | 220 | SBAD TREAS 312 | | 3121036500 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 121036500000076 | |
| 5 | 220 | SSA TREAS 303 | 1526004813 | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000100 | |
| 5 | 220 | TSA2 TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000090 | |
| 5 | 220 | TSP TREAS 310 | | 3101036009 | PPD | FED TSP | 112007 | 071120 | 324 | 2 | 101036000000000 | |
| 5 | 220 | US T TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000120 | |
| 5 | 220 | US TREAS 303 | | 3031036030 | PPD | SOC SEC | | 071119 | 324 | 2 | 031036030000001 | |
| 5 | 220 | US TREAS 310 | | 3101036216 | PPD | SOC SEC | | 071119 | 324 | 2 | 101036210000002 | |
| 5 | 220 | US TREAS 312 | | 3121036241 | PPD | SOC SEC | | 071119 | 324 | 2 | 121036240000003 | |
| 5 | 220 | US TREASURY 220 | | 3111036002 | PPD | VA ED CH30 | 112107 | 071121 | 325 | 2 | 111736870000000 | |
| 5 | 220 | US TREASURY 220 | | 3111036002 | PPD | VA MGIBSR | 112107 | 071121 | 325 | 2 | 111736880000000 | |
| 5 | 220 | US TREASURY 220 | | 3111036196 | PPD | VA BENEFIT | 112107 | 071121 | 325 | 2 | 111036190000000 | |
| 5 | 220 | US TREASURY 303 | | 3031736068 | PPD | RR UISI | 112007 | 071120 | 324 | 2 | 031736060000000 | |
| 5 | 220 | US TREASURY 310 | | 3101736134 | PPD | SUPP SEC | 112007 | 071120 | 324 | 2 | 101736130000000 | |
| 5 | 220 | US TREASURY 312 | | 3121736143 | PPD | CIVIL SERV | 112007 | 071120 | 324 | 2 | 121736140000000 | |
| 5 | 220 | USCG TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000085 | |
| 5 | 220 | USDA-FSAKCMOCDSP | | 3101036106 | CCD | 00 | 071119 | 071120 | 324 | 2 | 101036100000001 | |
| 5 | 220 | USGS TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000096 | |
| 5 | 220 | VAIN TREAS 220 | | 3111736917 | PPD | FEDVAINSUR | 112007 | 071120 | 324 | 2 | 111736910000000 | |
| 5 | 220 | 02 TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000044 | |
| 5 | 220 | 07 TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000030 | |
| 5 | 220 | 11 TREAS 310 | | 3101036009 | PPD | FED TRAVEL | 112007 | 071120 | 324 | 2 | 101036000000046 | |
| 5 | 220 | 11 TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000045 | |
| 5 | 220 | 16 TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000039 | |
| 5 | 220 | 18 TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000017 | |
| 5 | 220 | 20 TREAS 303 | | 3031036218 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 031036210000104 | |
| 5 | 220 | 34 TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000041 | |
| 5 | 220 | 36 TREAS 220 | | 3111036183 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 111036180000002 | |
| 5 | 220 | 3801000000000000 | | 9102036558 | PPD | FED PAYMNT | 071119 | 071120 | 324 | 2 | 102036550049528 | |
| 5 | 220 | 90 TREAS 310 | | 3101036151 | CCD | MISC PAY | 112007 | 071120 | 324 | 2 | 101036150000033 | |

| | | | | | | | | | | | | |
|---|-----|------------------|---------------------|------------|-----|------------|--------|--------|-----|---|-----------------|--|
| 5 | 225 | AAFES FUNDS CONT | CHECK ORIGINATION | 3333333304 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041736120073234 | |
| 5 | 225 | CMS MEDICARE | ACH TRANSACTION | 7505008003 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057023 | = items in these batches are debits, so presumably we do not need to consider these. |
| 5 | 225 | DEPTOFJUSTICE | ACH TRANSACTION | 1503000102 | WEB | DEBT PYMT | 071119 | 071120 | 324 | 2 | 042736144728544 | |
| 5 | 225 | HCTC | ACH TRANSACTION | 2009000401 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057056 | |
| 5 | 225 | HUD SF UFMIP | ACH TRANSACTION | 8609030004 | CCD | PAYMENT | 071119 | 071120 | 324 | 2 | 042736144723697 | |
| 5 | 225 | IRS FORM 8554 | ACH TRANSACTION | 2009000303 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057030 | |
| 5 | 225 | LOC/COP/DRPU | CHECK ORIGINATION | 0000798503 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041736120073234 | |
| 5 | 225 | NPDB QUERY | ACH TRANSACTION | 7503003001 | CCD | FEE | 071117 | 071120 | 324 | 2 | 042736144714431 | |
| 5 | 225 | RRB-MEDICARE | ACH TRANSACTION | 7505008001 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057020 | |
| 5 | 225 | SBP-RSFPP REMITT | ACH TRANSACTION | 0000852201 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057055 | |
| 5 | 225 | TREASURY DIRECT | DBT NEW TD PURCHASE | 9051736158 | PPD | TREAS DRCT | 071120 | 071120 | 324 | 2 | 051736150000001 | |
| 5 | 225 | U.S.MINT | ACH TRANSACTION | 2016140101 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670056990 | |
| 5 | 225 | US CBP | ACH TRANSACTION | 7005009701 | CCD | PAYMENT | 071118 | 071120 | 324 | 2 | 042736144717428 | |
| 5 | 225 | US DEPT OF ED | ACH TRANSACTION | 9102000101 | CCD | EREFUNDS | 071119 | 071120 | 324 | 2 | 042736144728544 | |
| 5 | 225 | USCIS I-90 FEES | ACH TRANSACTION | 7001010301 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057098 | |
| 5 | 225 | USDA APHIS VS | ACH TRANSACTION | 1240340001 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057066 | |
| 5 | 225 | USDA CCC257 | ACH TRANSACTION | 0000499201 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057054 | |
| 5 | 225 | USDA NFC DPRS | ACH TRANSACTION | 1240000101 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057061 | |
| 5 | 225 | USDA RD CSC | ACH TRANSACTION | 1220040801 | PPD | PAYMENT | 071119 | 071120 | 324 | 2 | 042736144733790 | |
| 5 | 225 | VETERANS AFFAIRS | ACH TRANSACTION | 3600120001 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057032 | |
| 5 | 225 | VETERANS AFFAIRS | ACH TRANSACTION | 3600120001 | ARC | PAYMENT | 071119 | 071120 | 324 | 2 | 041015670057035 | |
| 5 | 225 | 1201 LOAN PAYMT | ACH TRANSACTION | 7300000104 | WEB | PAYMENT | 071117 | 071120 | 324 | 2 | 042736144714645 | |