

February 6, 2009

VIA EMAIL: regs.comments@federalreserve.gov

Jennifer J. Johnson, Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551.

RE: Docket No. R-1350 (Excess Balance Accounts)

Dear Ms. Johnson:

TIB - The Independent BankersBank, the nation's largest bankers' bank, supports the proposed Regulation D amendment to allow limited purpose accounts termed "Excess Balance Accounts" (EBAs). TIB believes the establishment of such accounts will benefit correspondent agency programs by establishing a rate floor as well as supporting the initiatives contained in the most recent amendment allowing interest on reserves.

Furthermore, correspondent agency programs provide credit diversification, earnings and liquidity to healthy community banks nationwide. Community banks, by and large, are strong and well capitalized with growth capacity. We believe this sector of the industry should be supported with all tools possible as community banks are actively lending to Main Street and poised to lead the recovery of the nation's banking system.

However, in order to avoid causing undue regulatory burden on community banks as they face more pressing issues, we request the Board eliminate the requirement to have only one EBA agreement with only one correspondent and/or Federal Reserve Bank. As a rule, most community banks do not participate in multiple correspondent agency programs, resulting in form over substance. Additionally, correspondents maintain daily, detailed records of agency funds which are readily reviewable by regulatory authorities.

We appreciate your thoughtful consideration. I may be reached at 972.650.6025 or morourke@mybankersbank.com for any further clarification.

Sincerely,



Michael O'Rourke
President and CEO

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