



February 20, 2009

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Ave., N.W.
Washington D.C. 20551
Via Email: regs.comments@federalreserve.gov

Reference: Docket No. R-1350 – Proposed establishment of Excess Balance Accounts

Dear Ms. Johnson:

Thank you for the opportunity to comment on the proposed amendment to Regulation D and the establishment of Excess Balance Accounts, (EBAs). The Bankers' Bank of Kansas, (BBOK), as a service provider to over 200 customer banks, supports the establishment of such Excess Balance Accounts and the proposed manner for their administration.

Utilizing this new account structure will reduce disruption for BBOK and its customers, allowing BBOK to continue to act as Agent on behalf of the respondent banks with excess balances directed to the EBA. We feel that that the EBA program will be beneficial for both BBOK and its customer banks, providing stability in the Fed Funds market without adversely impacting the Bankers' Bank balance sheet.

Bankers' Bank of Kansas looks forward to the amendment of Regulation D and appreciates the opportunity to provide comment on the proposal.

Respectfully,
Bruce A. Schriefer
President & CEO