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May 28, 2009

**Maribel Bondoc**  
Manager, Network Rules  
NACHA  
13450 Sunrise Valley Drive, Suite 100  
Herndon, VA 20171

**RE: NACHA's Request for Information Regarding Customer  
Service Telephone Numbers**

Dear Ms. Bondoc:

The American Bankers Association<sup>1</sup> (ABA) appreciates this opportunity to comment on NACHA's Request for Information on a potential amendment to the NACHA Operating Rules. The proposed amendment would make the Customer Service Telephone Number (CSTN) of originators available to receivers of ACH transactions.

In general, the ABA supports the initiative to include additional information regarding the originator of ACH transactions in the ACH record. This will reduce the amount of time and resources Receiving Depository Financial Institutions (RDFIs) will need to resolve customer service inquiries. However, the ABA recommends that all consideration be taken to ensure that the inclusion of this additional data does not disrupt banks' current ACH processing to a degree that outweighs the potential gain in customer service efficiency.

Facilitating Customer Service

ABA supports the requirement that originators of ACH transactions include their own Customer Service Telephone Number (CSTN) in the ACH record for all consumer SEC codes. This information will allow RDFIs to provide the telephone number of the transaction's originator to the

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<sup>1</sup> The American Bankers Association brings together banks of all sizes and charters into one Association. ABA works to enhance the competitiveness of the nation's banking industry and strengthen America's economy and communities. Its members—the majority of which are banks with less than \$125 million in assets—represent over 95% of the industry's \$13.6 trillion in assets and employ over two million men and women.

consumer and reduce the amount of resources required of RDFIs when customers challenge the validity of a transaction in their account. ABA cautions that refinement of the SEC codes and instructions for their use will need to be worked out to focus the solution on the real concerns that arise from large commercial originators and not otherwise complicate the ACH process for individual transactors.

ABA supports placing the CSTN in the Company Discretionary Data Field, because that field's current use for consumer transactions is limited. Using this field for the CSTN will minimize any required programming changes for the Originating Depository Financial Institutions (ODFIs) who must populate the field and the RDFIs who will be disseminating it to their customers.

ABA recommends that ODFIs not be required to validate CSTN information provided by originators. This would place an undue operational burden on ODFIs, especially if there were an ongoing monitoring requirement. If an ODFI becomes aware that a CSTN is not operational, the ODFI should work with the originator to correct the information; but no ODFI liability should result from any such originator operational deficiency.

ABA recommends that RDFIs be allowed discretion on whether to include the CSTN in periodic statements. Each financial institution should be allowed to make the judgment whether the benefit of including the CSTN in all circumstances outweighs the costs of reconfiguring statement formats. A financial institution may choose to omit the CSTN from statements but make it available if a customer initiates a query regarding the transactions. The business decision should be retained by the RDFI.

### Implementation Time Table

ABA recommends that the future rule change regarding adding the CSTN allow for a 12 month implementation period before it is made mandatory to allow for ODFIs to educate their originators of its requirements and for all financial institutions to complete and test software changes. Any change to the Operating Rules that is made will have an impact on all financial institutions in the network. ABA believes that it is vital for any change resulting from this proposal to have a minimum negative impact on the financial institutions that must comply with it.

All financial institutions are preparing for the International ACH Transaction (IAT) SEC code change that is effective September 2009. Many financial institutions are spending millions of dollars to meet the requirements of the rule change. NACHA recently proposed another rule change that would facilitate the inclusion of eXtensible Markup Language (XML) in certain ACH transactions. This potential rule change will also require significant software upgrades and testing, all of which are expensive.

ABA recommends that NACHA consider developing a set of guidelines to coordinate future ACH system development changes. This would allow financial institutions participating in the ACH network to have adequate time to construct the system's development life cycle of projects cost effectively, including planning, coding, and testing of the system. In some cases this may suggest that certain independent proposals be combined to become effective on the same date, and in other cases it may

suggest that the projects be implemented separately with an adequate period of time in between each effective date. Financial institutions also have to incorporate policy changes and staff training to meet regulator expectations when most changes are required. Financial institutions and the ACH network would benefit from “smoothing” the calendar around proposals requiring systems development.

ABA appreciates the opportunity to comment on the CSTN Request for Information. If you have any questions about these comments, please contact Stephen Kenneally at 202-663-5147 or via email at [skenneally@aba.com](mailto:skenneally@aba.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Stephen K. Kenneally".

Stephen K. Kenneally  
Vice President  
Center for Regulatory Compliance