



MISSOURI CREDIT UNION ASSOCIATION

June 28, 2013

Maribel Bondoc
Manager, Network Rules
NACHA – The Electronic Payments Association
13450 Sunrise Valley Drive, Suite 100
Herndon, VA 20171
mbondoc@nacha.org

RE: Don Cohenour, - Clarification of Third-Parties in the ACH Network

Dear Ms. Bondoc:

On behalf of the 1.3 million credit union members, the Missouri Credit Union Association (MCUA) would like to take this opportunity to express our views on the Electronic Payments Association's (NACHA's) proposal on clarification of third-parties in the Automated Clearing House (ACH) network. NACHA – The Electronic Payments Association recently issued a request for comment regarding the clarification of third-parties in the Automated Clearing House (ACH) Network.

The proposed amendments would clarify the definitions, roles, and responsibilities of third-party service providers and/or third-party senders on ACH transactions, and are intended to strengthen NACHA Operating Rules compliance among ACH participants. These proposed changes are intended to be technical amendments. NACHA believes that Originating Depository Financial Institutions (ODFIs) and Receiving Depository Financial Institutions (RDFIs), which include credit unions, should not incur additional costs to comply with these changes if they are currently in compliance with the NACHA Operating Rules.

MCUA supports the proposed technical amendments. We commend NACHA for expanding and clarifying the identification of the originator in consumer debt; third-parties and receiver authorizations; definition of third-party and third-party provider; and third-party audit requirements. We also appreciate NACHA providing the supplemental information in the Operating Guidelines.

As always, we appreciate the opportunity to respond to this proposal. We will be happy to respond to any questions regarding these comments.

Sincerely,

Don Cohenour
President

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2055 Craigshire Drive • St. Louis, Missouri 63146-4009 • T: 314-542-0555 • F: 314-542-1387
6220 Blue Ridge Cut-Off, Suite 300 • Kansas City, Missouri 64133-3730 • T: 816-313-0005 • F: 816-313-0011
1-800-392-3074 • www.mcu.org

