

From: [Terrie Wollard](#)
To: [Regulatory Comments](#)
Subject: Comment Contingency Liquidity Funding
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I feel that we have adequate borrowing sources.

When Southwest Corp FCU closed, we chose to establish an account with the Fed for all settlements and not open another corporate account. We had already established an account with the FHLB also. We transferred all of our securities to FHLB. We find that borrowing from the FHLB using our securities is very easy. They can accommodate overnight to long-term borrowing. Rates are reasonable.

I have reviewed the CLF and find that they will only lend overnight and it is at a much higher rate than FHLB. If we were having a liquidity problem, I don't believe the problem would be solved overnight. Plus the process to set up this borrowing source is a challenge also. We will have to monthly send them a file of our auto loans. I am not let sure if they will accept auto loans since we do not have the paper files scanned and/or files separated so that the files can be easily reviewed by their compliance team.

From the conversations I have had with the Fed and FHLB to comply with the proposed regulation, would limit my borrowing from FHLB (longer terms and at lower rates) and transfer it to Fed (overnight and at a much higher rate).

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