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November 11, 2009

The Honorable Timothy F. Geithner
Secretary of the Treasury
United States Department of the Treasury
System 1500 Pennsylvania Avenue, NW
Washington, DC 20220

The Honorable Ben S. Bernanke
Chairman
Board of Governors of the Federal Reserve
20th Street and Constitution Avenue, NW
Washington, DC 20551

**Re: Delay of Regulation GG, Prohibition on Funding of Unlawful Internet Gambling,
Compliance Date**

Dear Secretary Geithner and Chairman Bernanke:

On behalf of the National Automated Clearing House Association (“NACHA”)¹, I want to echo the sentiments of the Honorable Barney Frank and other members of the House Financial Services Committee and urge you to exercise your authority under the Administrative Procedure Act to delay the compliance date of regulations under the Unlawful Internet Gambling Act of 2006 (UIGEA) for one year to December 1, 2010. NACHA understands that other industry representatives have expressed a similar request.

Based on the number of calls NACHA continues to receive, there remains much uncertainty among financial institutions around compliance with UIGEA and Regulation GG. Legislation currently pending in Congress would alleviate much of the confusion associated with implementing UIGEA. A one year extension of the compliance date would give Congress time to act upon this legislation, and would eliminate the need for financial institutions to establish compliance protocols under the current regulation, only to have to alter them if this legislation passes.

We urge you to move back the compliance date of Regulation GG to December 1, 2010, thus giving Congress additional time to take appropriate action and financial institutions additional time to comply with any regulations.

Thank you for considering this important issue.

Sincerely,

/s/ Ian Macoy, AAP
Managing Director

¹ NACHA is a not-for-profit association that represents more than 11,000 financial institutions through direct memberships and a network of regional payments associations, and 650 organizations through its industry councils. NACHA develops and administers operating rules and business practices for the Automated Clearing House (ACH) Network and for electronic payments in the areas of Internet commerce, electronic bill and invoice presentment and payment (EBPP, EIPP), e-checks, financial electronic data interchange (EDI), international payments, and electronic benefits services (EBS). The NACHA Operating Rules also govern ACH transactions involving Federal agencies, having been adopted through 31 CFR part 210.