

Comments FDIC-2015-0048-0001 RIN 3064-AE33 Large Bank Deposit Insurance Determination Modernization due 7.27.2015

You are addressing 37 banks with more than two million accounts, with at least \$2 billion in domestic deposits and at least (1) 250,000 deposit accounts; or (2) \$20 billion in total assets.. We assume that these are your largest, well-advertised banking institutions.

Alarming, in this day of technology and smartphones, is the lack of identification and data needed to make distribution less burdensome. We interpret this to mean that fraud is easy to execute. With that in mind, fraud protection mechanisms may be needed to be considered as part of this rule.

We also question what back-up systems exist in event of power failure or another disaster. How would that backup system precaution enhance or prohibit this process.

Larger institutions are issuing less cards and tie in account together against fraud protection. With that in mind, is the term "*in the same capacity and the same right*" being accounted for already?

Since identification numbers are required, trust agreements would seem to be required, but this notice insinuates that they are not. Not clear is the number of accounts, of the two million minimum would be affected. Those percentages of business need to be included in rulemaking. Business accounts have incorporation papers or ownership publication required in order to open an account.

In a large urban city, the complexities would seem expected, but in a smaller setting, those issues may not be such a burden. Do regional practices weigh on the burden of distribution? Because the State of Delaware incorporates so many companies, are there records complete enough for the FDIC process.

Pass-Through Coverage Accounts should have more thorough records and not rely on the brokers, agents and custodians to reveal the holder after-the-fact. The Account may need to be opened under the name of the actual owner.

Retirement accounts, employee benefit plan accounts and government accounts should be analyzed as to size of ownership/beneficiary. With larger accounts, there should be data available, as deposits for contributions depend on eligibility. For government accounts, which could be in the hundreds for one local government due to sources of funding, the government should be identified as owner of the account.

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