

STATEMENT SUBMITTED BY T. H. MILNER, JR.,
PRESIDENT, AND BRADFORD BRETT, CHAIRMAN, FEDERAL
LEGISLATIVE COMMITTEE, OF THE INDEPENDENT
BANKERS ASSOCIATION OF AMERICA

Our association welcomes the proposals, and prospective changes in the Federal Reserve "discount window" operations, designed to enable commercial banks to meet more effectively the credit needs of their communities, as recommended in this Fed report after 3 months of study.

Our association welcomes the changes proposed in present procedures to give member banks more generous borrowing privileges for seasonal advances and additional short-term borrowing privileges under certain circumstances.

We approve proposed reforms to include emergency credit facilities for member banks, savings and loan, mutual savings banks, insurance companies and possibly credit unions. Until such time as the Federal Reserve, in its role of monetary management, is empowered to fix the requirements for financial institutions other than commercial banks, we believe such credit should be limited to emergencies.

The Independent Bankers Association approves the proposals to amend monetary policy procedures to make possible frequent adjustments perhaps even weekly, in the discount rate at which banks borrow from the Fed. Our association welcomes the Joint Economic Committee hearings to provide a forum for full discussion of the Fed report, and comment by Fed spokesmen, the banking community, and the combined academic and economics community.

As president and Federal legislative chairman of our association, we are convinced that any plan the Federal Reserve adopts to amend and liberalize the procedures to enable member banks to borrow from the Fed will be an improvement.

Our association wishes to affirm and reaffirm our widespread membership conviction that the Fed should encourage the smaller banks to borrow from the Fed. In this connection, we believe the plan of the Federal Reserve to lend should be amended and updated as the Board has requested of the Congress. We likewise believe the Fed should be encouraged to contribute more in a helpful way to the operation of banks, the better to enable them to meet and solve the myriad problems which confront them.

As a broad part of the general problem of maintaining a sound and viable dual banking system that is now traditional in our country, our association is fully aware that many services and functions are now being handled by the correspondent banks, and is convinced that should the correspondent banks continue to merge and pursue the branch banking or holding company competitive route, that the day will soon come when there will no longer be large banks with which the community banks can do business.