

of the responsibility for accommodating these short-run reserves thus allowing such operations to be undertaken with increased attention to the longer run concerns.

I recognize that one other effect of the proposed new discount mechanism would probably be some lowering of the levels of liquidity maintained by certain groups of banks as they are able to rely on the Reserve for increased credit to meet temporary unforeseen or rising needs. However, this effect is expected to be concentrated in smaller rural banks which, because of anticipated need and lack of access to the central money market, presently maintain an unusually high portion of their resources in highly liquid but low-yield assets such as U.S. Government securities, or, in a surprising number of cases, in nonearning excess reserves. This tendency on the part of some country banks can, of course, result in the credit needs of the communities they serve being less than fully met.

On the other hand, the proposed redesign is not likely to have a significant impact on the liquidity of the larger city banks which already have convenient access to market sources of funds. In addition, the supervisory function of the Federal Reserve and that of the Controller of the Currency will continue to operate to insure that individual member banks maintain adequate liquidity.

Professor Friedman's characterization of the discount window as conveying a subsidy to member banks must be based on some misunderstanding of the proposal. The rate charged on borrowing under the discount arrangements would not, as Professor Friedman states, be an average 2 percentage points below market rates, but on the contrary would be kept in reasonably close alignment with market rates. This is a clearly stated aspect of the proposal, and it assures that there will be no significant subsidy to banks or cost to the U.S. Treasury. Moreover, access to the window is normally limited to member banks and the value of this privilege ought to be weighed in light of the requirement that these banks maintain a portion of their deposits in nonearning capacity as reserve.

I am grateful for this opportunity to express my views on Professor Friedman's comments. As you know, the Board is actively soliciting reactions from all sources on the proposals for redesign of the discount mechanism and is endeavoring to give full and open consideration to all comments received. I feel that this process should include opposing views when, as in the present case, it is felt that important misconceptions are involved in those comments. I would appreciate it if you would include this letter in the record of your hearings on the discount mechanism.

Sincerely,

GEORGE W. MITCHELL.