

13 January 2017

Submitted via Email: SpecialPurposeCharter@occ.treas.gov

Mr. Thomas J. Curry Comptroller of the Currency
Office of the Comptroller of the Currency
400 7th Street, SW Washington, D.C. 20219

Re: Special Purpose Charter / FinTech Charter

Dear Comptroller Curry:

I have been a banker since 1971 and I have been a FinTech developer since 1994.

I was a founder and CEO of Bank of Internet USA (NASD BofI). BofI is a full service bank with a FinTech focus that was chartered and opened on July 4, 2000.

Paymency is my new FinTech venture.

Paymency is a new mobile, APP and API driven platform for people to manage, budget and spend money. We bring a fresh approach that uses a financial platform to reach the masses. Paymency will make banking, payments and financial products cool to use, accessible and affordable for everyone, rich or poor. The Paymency platform for banking and finance will be as valuable, popular and useful as Amazon is for non-financial products. Our GroovyPay mobile payment network is the first platform product. Cities and banks are our first channels. GroovyPay will serve everyone including, the underbanked, unbanked and unique challenges of US border communities.

Our design is to serve all consumers at no cost and merchants at minimal cost. This includes the unbanked, underbanked and border banking community. Our initial focus is small dollar payments and we are building a platform marketplace for banking and financial products offered by others and available to all.

OCC FinTech Bank Charter

The 1904 branch model has lost its value and digital currency is not far from reality. We expect the concept of a FinTech bank charter will be the typical bank charter in 10 years. We were initially excited with the prospects of a full FinTech bank charter with lower capital regulations because we didn't make loans. Our position changed after analysis. When all is said and done, a FinTech bank must be subject to the same regulations as traditional banks. If not, existing banks would convert to a new FinTech bank charter.

I believe that most FinTechs and the new economy would be best served with a bare-bones national corporation (charter) with the federal preemption. This bare-bones charter would keep the OCC in the FinTech eco-system at little risk. FinTechs would become familiar with OCC regulation that might make future mergers with banks easier or make a FinTechs transition to banking products smoother at a later date.

Paymency Needs

We would like a national corporation with FRB access to use the ACH network and the soon to be launched FRB faster payment network. We would serve as an ODFI and RDFI to better interface to our payment network.

We would like all of our prepaid funds and network funds held at the FRB. Alternatively, our prepaid funds would be held in existing banks if we can't use the FRB account.

A national charter would be valuable in speeding up our deployment and keeping our costs low. This will improve our negotiation ability with banks or bankers banks for other services. The money saved will benefit our customers.

Financial Inclusion

We believe that financial inclusion will be difficult for the vast majority of FinTechs and unlike a traditional bank, the FinTechs are often a one product company. This is not a problem for us because we have designed for financial inclusion. Our goal is to serve the millions of unbanked and underbanked and small merchants.

Having been in banking since 1971, I have seen the growing base of unbanked and underbanked. In 1971 people like my mother that didn't drive had no ID but she had saving and checking accounts. We can meet that need at very low risk. Our elegantly designed GroovyPay prepaid product will work with cities, states, chambers of commerce, non-profits and religious groups to serve the underbanked.

Many FinTechs will most likely need to participate with or invest in another FinTech or bank that does meet inclusionary market needs. As an example, Pasadena Community Bank recently invested "\$700,000 in Clearinghouse CDFI to Benefit Distressed Communities throughout California".

We believe that it is better to allow the FinTech to focus on their business and invest or partner with companies like Paymency to meet financial inclusion needs.

Conclusion

Paymency customers would benefit if we had a bare-bones national charter, subject to regulation, with access directly to the Federal Reserve System ACH and the soon to be announced Faster Payment network.

Sincerely:

Gary Lewis Evans,
President & CEO
Paymency Inc.