

## Reg D: Guide to Money Market and Savings Accounts Transaction Limitations

As part of *Regulatory Risk Monitor's* ongoing effort to offer you practical compliance tools, we publish the following chart used by the Business Bank of California, (\$225 million), San Bernardino, to eliminate confusion in determining the transaction limitations associated with savings and money market accounts. An outside compliance officer and a consultant gave the chart a thumbs-up. NOTE: Of the transactions that are limited, there can only be a total of SIX debits, NO MORE THAN THREE of which are to be made to a third party.

TRANSACTIONS		LIMITATIONS			COMMENTS
		Six (Per Statement Cycle)	Three (Per Statement Cycle)	Unlimited	
ACH	Pre-Authorized Debits	X			To a Third Party such as membership or insurance.
ATM	Withdrawal			X	
	Transfer			X	
	Point of Sale Purchase		X		Third-party purchase treated like a check.
Checks	Payable to Cash or Account Holder			X	Must be negotiated in person at a branch office.
	Payable to a Third Party		X		
Transfers	Request via Telephone, Fax or Data Transmission	X			Only to account with same name.
	Fax request to different account holder		X		Transfer to third party treated like a check.
	Pre-authorized Transfer	X			For example: overdraft protection.
	Auto debit to make loan payment			X	For a BBC loan payment only.
	Originated in person, by messenger or mail			X	

Source: Business Bank of California