Minutes for February 2, 1961

To: Members of the Board

From: Office of the Secretary

Attached is a copy of the minutes of the Board of Governors of the Federal Reserve System on the above date.

It is not proposed to include a statement with respect to any of the entries in this set of minutes in the record of policy actions required to be maintained pursuant to section 10 of the Federal Reserve Act.

Should you have any question with regard to the minutes, it will be appreciated if you will advise the Secretary's Office. Otherwise, please initial below. If you were present at the meeting, your initials will indicate approval of the minutes. If you were not present, your initials will indicate only that you have seen the minutes.

Chm. Martin
Gov. Szymczak
Gov. Mills
Gov. Robertson
Gov. Balderston
Gov. Shepardson
Gov. King
Minutes of the Board of Governors of the Federal Reserve System on Thursday, February 2, 1961. The Board met in the Board Room at 10:00 a.m.

PRESENT: Mr. Martin, Chairman
Mr. Balderston, Vice Chairman
Mr. Szymczak
Mr. Mills
Mr. Robertson
Mr. Shepardson
Mr. King

Mr. Sherman, Secretary
Mr. Kenyon, Assistant Secretary
Mr. Thomas, Adviser to the Board
Mr. Young, Adviser to the Board
Mr. Molony, Assistant to the Board
Mr. Fauver, Assistant to the Board
Mr. Hackley, General Counsel
Mr. Noyes, Director, Division of Research and Statistics
Mr. Farrell, Director, Division of Bank Operations
Mr. Solomon, Director, Division of Examinations
Mr. Hexter, Assistant General Counsel
Mr. Hooff, Assistant General Counsel
Mr. Nelson, Assistant Director, Division of Examinations
Mr. Leavitt, Supervisory Review Examiner, Division of Examinations

Examiners' Conference. There had been distributed copies of a memorandum from the Division of Examinations dated January 31, 1961, recommending that approval be given to (1) a conference of representatives of the Bank Examination Departments of the Federal Reserve Banks in Washington on March 20-21, 1961, and (2) a dinner in connection therewith for Reserve Bank representatives and designated Board personnel. It was indicated that a list of those to be invited to attend the dinner would be submitted at a later date.
There being no objection, the recommendations contained in the memorandum were approved unanimously.

Application of Riverside Trust Company (Item No. 1). There had been distributed copies of a memorandum from the Division of Examinations dated January 27, 1961, analyzing the application of Riverside Trust Company, Hartford, Connecticut, for permission to merge with Broad Brook Bank and Trust Company, East Windsor, Connecticut, under the charter and title of the applicant, and for approval of the operation of a branch at the present location of the Broad Brook Bank. The recommendations of the Federal Reserve Bank of Boston and the Division of Examinations were favorable. The views expressed by the Comptroller of the Currency, the Federal Deposit Insurance Corporation, and the Department of Justice were in terms that consummation of the proposed transaction would not have an adverse effect upon competition.

After discussion, unanimous approval was given to the letter to Riverside Trust Company of which a copy is attached as Item No. 1.

Application of Dauphin Deposit Trust Company. There had been distributed copies of a memorandum from the Division of Examinations dated January 30, 1961, analyzing an application of Dauphin Deposit Trust Company, Harrisburg, Pennsylvania, for consent to merge with Camp Curtin Trust Company, also of Harrisburg, under the charter and title of the applicant, and for approval of the operation of four offices of Camp Curtin as branches of the resulting bank. The recommendation of
the Federal Reserve Bank of Philadelphia was favorable, but the Division of Examinations recommended that the application be denied. In the opinion of the Division, there was considerable evidence that the effect of the merger would be to eliminate substantial competition between the two banks while increasing the position of the bank (Dauphin Deposit) currently occupying a position of dominance in its area. These adverse effects with respect to competition were judged to outweigh the benefits claimed by the applicant, including an increase in the aggregate amount of real estate loans the bank could hold, the increased legal lending limit to one borrower, and the increased number of offices of the resulting bank. The reports from the Comptroller of the Currency and the Federal Deposit Insurance Corporation on the competitive aspects of the proposal were in terms that consummation of the transaction would not have a detrimental effect. However, the Department of Justice expressed the view that the merger would promote a tendency toward monopoly and would encourage an existing tendency toward further concentration of commercial banking in the area.

In commenting on the matter, Mr. Nelson said the Federal Reserve Bank considered this a close case and found it difficult to arrive at a recommendation. The Division of Examinations felt there was evidence of sufficient competition between the two institutions to justify the conclusion that a substantial lessening of competition would result if the
merger were effected. Dauphin Deposit, he noted, had expanded through mergers several times in recent years.

Mr. Solomon indicated that the Division of Examinations had sought to find grounds on which a recommendation for approval might be based. However, while he would not want to convey the impression that this was an open-and-shut case, it seemed to the Division that it was difficult to find advantages to counterbalance the reduction of competition that would appear to result from consummation of the proposed merger, through which the dominant institution in the area would appreciably increase its size. Although the percentage of total deposits controlled by the resulting bank would vary somewhat depending on one's judgment as to the area of competition, the bank clearly would control a substantial part of total area deposits; according to the area of competition selected, deposits controlled by the resulting bank would range from 28 per cent to 31 or 36 per cent of total deposits. If one looked at Harrisburg alone, the portion of deposits controlled would be about 45 per cent. Probably the city of Harrisburg was too limited an area, and one would want to include certain outlying banks; if so, however, the portion of deposits controlled would still be about 36 per cent. Furthermore, Dauphin Deposit would be considerably larger than its principal competitor. In the light of the principles the Board had seen fit to follow in other merger cases, it was felt that this application could hardly qualify for approval.
In reply to a question, Mr. Solomon said it had been difficult for him to understand why the State banking authorities had rejected an application by Dauphin Deposit to establish a branch in the north Harrisburg area and yet had indicated that the merger would be approved if the approval of the appropriate Federal authority was obtained. However, the Federal Reserve Bank understood that the branch application was turned down in order to protect Camp Curtin Trust Company and two other banks in the same area from undue competition. Apparently, since the merger would not introduce additional offices, the State felt that approval thereof would not conflict with the concept of protecting local institutions. Also, it now appeared that one of the two remaining local banks was going to be merged into another bank in the Harrisburg area.

The members of the Board then stated their views, beginning with Governor Mills, who said that in his judgment the application was eligible for approval. The merger would not appear to give Dauphin Deposit Trust Company an overwhelming market power or dominance in the area, as measured by percentages; that is, accepting the figure of about 35 per cent control of deposits. In any event, however, he felt it was important in the analysis of these problems to be wary about depending too much on percentages to arrive at a dividing line between approval or disapproval, for circumstances varied widely in the applications submitted to the
Board. Essentially, this application involved the desire of an important bank, with the concurrence of the Camp Curtin bank, to extend its services within a homogeneous territorial unit; namely, the city of Harrisburg. In general, it seemed to him that the Board should not interpose objection unless there was patent evidence against permitting an applicant bank to provide services within the city where it was domiciled; that is, unless there were good reasons to the contrary. Accordingly, he felt that Dauphin Deposit should not be prevented from accomplishing its desire to serve better the city in which it was located. To him, a persuasive reason in that regard was that both banks were what one might call family banks, in that to a large extent they catered to the needs of the residents of the city through making mortgage and personal loans. This meant in a sense that the size of the credit facility afforded by them was geared to the size of the personal resources of their clients, and that by and large the type of client who would seek those services would also be able to obtain such services readily at other banks, at savings and loan associations, and at finance companies and credit unions. In the circumstances, he did not think there was evidence of a tendency toward monopoly that would be disadvantageous to the community in the real sense of the word. He got back to the philosophy that had been recited before; namely, that the Board had
an obligation to advance and forward the wishes and ambitions of the
banks under its supervision unless there were incontestable reasons
for denying the applications submitted to it. In this case, he felt
that perhaps too much emphasis had been placed by the Division of
Examinations on the competitive factor. There are, he pointed out,
several other factors that the Board is also required by statute to
take into account in considering bank merger applications.

Governor Robertson stated that he concurred in the recommen-
dation of the Division of Examinations. He felt that the merger would
result in a distinct diminution of competition and that there was
nothing favorable enough in the other factors to offset it.

Governor Shepardson said that he was inclined toward disapproval.
The applicant bank had grown quite fast through mergers, he noted, and
this may have had some effect on the rating of the bank, which did not
seem to be in the best of condition. He agreed with Governor Mills
that it was difficult to draw a line in terms of percentages. However,
the condition of the applicant bank and the frequency of the mergers in
which it had participated suggested that the bank may not have been able
to resolve fully the problems incident to its expansion. Accordingly,
there might be a sound basis for retarding further expansion for a while.

Governor King stated that this application had been one of the
most difficult for him to resolve, and that he found himself almost as
much on dead center as one could be in a matter of this kind. Such being the case, he was inclined toward an attitude of leniency rather than to be on the restrictive side. On that basis, he would be willing to approve the application.

Governor Szymczak expressed agreement with the recommendation of the Division of Examinations.

Governor Balderston said that he would favor approving the application. He noted that, excluding from consideration the expansion resulting from mergers, in recent years Dauphin Deposit had not experienced a deposit growth comparable to that of the outlying bank, its increase in deposits having been about 22 per cent during the period 1955-59, compared with a 53 per cent increase for the Camp Curtin bank. If downtown banks were denied the opportunity to follow the movement of population into the suburbs, he felt that a disservice would be done to those institutions, and probably to the communities in which they were located.

Chairman Martin said that, like Governor King, he had found himself almost on dead center after reviewing this application. In those circumstances, however, he would lean toward accepting the recommendation of the Division of Examinations. Before the Board took action, he felt that it would be desirable to go back to the Philadelphia Reserve Bank, which had recommended approval, and give the Reserve Bank an opportunity to present any further information or
comments that it might care to offer, particularly since it seemed agreed that this was a close case.

Question was raised by Mr. Solomon regarding the possibility of checking also with the Secretary of Banking for the State of Pennsylvania. It was noted, however, that this would not be in accord with the usual procedure and that the Reserve Bank had been in touch with the State authorities in the course of processing the application. Accordingly, it was the view of the Board that this step need not be taken.

Pursuant to Chairman Martin's suggestion, it was then agreed to ascertain whether the Philadelphia Reserve Bank wished to submit any additional views or comments on this matter, following which the application would be considered further by the Board.

Messrs. Nelson, Hooff, and Leavitt then withdrew, and Messrs. Marget, Director, Division of International Finance, Hersey, Adviser in that Division, and Koch, Adviser, Division of Research and Statistics, entered the room. Mrs. Sette, Chief, Economic Editing Unit, Division of Research and Statistics, also joined the meeting at this point.

Text of Annual Report. There had been distributed copies of a memorandum from Mr. Molony dated January 31, 1961, submitting a draft of the sections of the Board's Annual Report for 1960 that would precede the Policy records of the Board and the Federal Open Market Committee.
Following comments by Mr. Molony on the general approach that had been followed in preparing the text of the Annual Report, several suggestions were made by members of the Board for modifications of the text at various points. It was understood that the staff would proceed with editorial work, that the suggestions made at this meeting would be taken into account, and that there would be an opportunity for further review of the text when the report was in proof form.

In the course of the discussion, question was raised by Governor Balderston as to whether it would be desirable to include at an appropriate place in the report a summary statement on the course of System policy during the year 1960. An alternative suggestion was that the digest of principal policy actions be set forth more prominently than in previous Annual Reports. No conclusions were reached in these respects, but it was understood that the suggestions would be considered further by the staff.

Messrs. Marget, Solomon, Hexter, and Hersey then withdrew, as did Mrs. Sette, and Mr. Petersen, Special Assistant, Office of the Secretary, entered the room.

Policy record of Federal Open Market Committee. With a memorandum dated January 31, 1961, which had been distributed, Mr. Young, Secretary of the Federal Open Market Committee, submitted a revised draft of the record of policy actions of the Committee during the
calendar year 1960. This record had been prepared for inclusion in the Annual Report of the Board of Governors pursuant to the requirements of section 10 of the Federal Reserve Act. The memorandum noted that preliminary drafts of policy record entries for the respective meetings had been submitted during the course of the year 1960 to the members of the Committee and to the Reserve Bank Presidents not currently serving as members. Almost all of the suggestions received had been taken into account in the preparation of the revised draft but, as indicated in the memorandum, a few of the suggestions were of such a nature that it appeared desirable to submit them to the Board for decision.

At the Board's request, Mr. Young reviewed the suggestions that had not been taken into account in the preparation of the revised draft.

With regard to suggestions by Mr. Allen, President of the Federal Reserve Bank of Chicago (and an alternate member of the Committee), and Mr. Deming, President of the Federal Reserve Bank of Minneapolis, regarding the entry pertaining to the action of the Open Market Committee on April 12, 1960, authorizing swap transactions, if necessary, to accumulate in the Open Market Account up to $150 million of one-year bills maturing July 15, 1960, it was the view of the Board that the entry set forth in the revised draft reflected satisfactorily the effect of the action.
taken by the Committee and the reasons therefor. Accordingly, it was agreed that the entry should not be revised.

With respect to letters from Mr. Bryan, President of the Federal Reserve Bank of Atlanta (and a member of the Committee), dated September 29 and November 28, 1960, expressing the opinion that it would be preferable for the Open Market Committee not to state its policy instructions in terms such as the tone and feel of the market or the resolving of doubts on the side of ease, it was noted that the policy record entries reflected the instructions given by the Committee, as recorded in the minutes of the respective meetings, and that Mr. Bryan did not question their accuracy. In the circumstances, it was agreed that the letters from Mr. Bryan did not call for changes in the policy record entries.

With regard to a suggestion by Governor Robertson that there be added to the policy record entries covering the Committee meetings on November 22 and December 13, 1960, separate statements of his position in approving the directives issued at those meetings, Mr. Young commented that this raised again the question of how far it would be considered desirable to go in setting forth the individual views of members of the Committee. After discussion of this general question at the Board meeting on June 24, 1959, the conclusion had been reached that, except in cases when a member dissented from a Committee action, it was preferable not to
attempt to include in the Annual Report the various shades of opinion that might have been expressed by individuals. However, it had been agreed that the policy record should be preceded by an introductory statement which would emphasize that there were variations in the views of members who voted for any given action. Such a statement was included in the Annual Reports for 1958 and 1959, and a similar statement was proposed to be included in the Annual Report for 1960. Further, it was suggested in Mr. Young's memorandum that there might be added to the entry for December 13, 1960, the substance of Governor Robertson's suggestion in terms that at least one member "urged an increase in the volume of bank reserves even if the level of short-term interest rates were to decline". (During the discussion at this meeting, it was also suggested by Mr. Young that a somewhat similar addition could be made to the November 22 entry).

Governor Robertson commented that if a member of the Committee voted against the policy directive, his reasons were stated in the policy record. At the Committee meetings in question, Governor Robertson said, he had felt that the language of the directive was broad enough to encompass his own point of view, and therefore he had voted for the directive. Nevertheless, he believed that his reasons for voting for the directive should be included in the policy record and, as a matter of fact, that the inclusion of those reasons would tend to strengthen
the position of the majority because it would indicate that the Committee's position was not taken without careful consideration and after the presentation of opposing points of view. Governor Robertson indicated that the inclusion in the December 13 entry of language such as suggested by Mr. Young would not be sufficient for his purpose. On other occasions, he noted, he had not requested that his own views be set forth. In these two instances, however, he felt that the difference between his position and the position of the majority of the Committee as to the manner in which the directive should be implemented was sufficiently great to warrant including a summary of the views that he had expressed at the respective meetings.

There followed a discussion during which Governor Szymczak, in response to a question directed to him by the Chairman, said he envisaged that substantial problems could arise from following a procedure under which individual views would be included in the policy record. He pointed out that there can be many differences of interpretation on the part of the individual members of the Committee at any meeting, and that a practice of setting forth in the policy record the opinions of individual members would involve getting into many different shades of opinion. This might eventuate in the preparation of a policy record of an entirely different type. If a member dissented, his vote was recorded, along with the reasons therefor. However, if an effort
should be made to set forth all of the different interpretations of those who had voted with the majority, the policy record would have to be extensive. If this procedure was followed for any one member, others might feel impelled to follow the same course.

Governor King suggested that such a procedure might mean that as many as 10 or 12 different views would have to be expressed in the entry for each meeting. In his own case, he could recall several occasions when his reasons for voting for the directive varied somewhat from those embodied in the consensus.

Governor Mills indicated that he shared the views expressed by Governors Szymczak and King; that is, that a dissent should be explained but otherwise individual opinions should not be carried in the policy record. He noted that there was no requirement in the statute that the judgments of individual members of the Committee be set forth in the policy record.

Governor Robertson said that the question was not open and shut and that he could see grounds for differing views. However, strict adherence to a procedure such as suggested by the members of the Board who had spoken would mean that a Committee member would be forced to dissent from the directive merely because he interpreted the language of the directive in a manner different from the majority. Furthermore, there were degrees of difference, and in many cases the degree of
of difference was slight. When the degree of difference was substantial, he felt that the members ought to be permitted to state the reasons underlying their votes.

After further discussion, Chairman Martin commented that if there was a feeling that all shades of opinion ought to be set forth, logic would suggest publishing the minutes of the Open Market Committee. He went on to say that from time to time he had been re-reading the minutes covering a period of several years, and that he had almost become convinced that there might be an advantage in publishing the minutes verbatim for some past period. Collectively, they comprised a fairly good record of the reasons why the Committee had taken its various actions, and students would have a better idea as to why the Committee had acted in the manner that it did. As a public record, moreover, the minutes would have advantages over a book about the System that might be written by one person, for they would go beyond any one person's point of view. At times there were shadings that did not come out in the minute record, but in his opinion the collective record was quite impressive.

Governor Robertson replied in terms that the Congress had provided by statute that it be furnished with a report of policy actions taken and the reasons therefore. In a sense, this might be said to justify publication of the entire minutes, but he was not suggesting such a step at this time. He was merely suggesting that the policy
record be as explicit as possible and that it not appear as though all members of the Committee had taken exactly the same position. At the two meetings in question, there had been a substantial disparity between his views and those of the majority, although his views also happened to fall within the scope of the policy directive approved by the Committee. As he had said, he did not feel that an addition to the December 13 entry such as suggested by Mr. Young would accomplish the purpose he had in mind.

Governor Balderston commented that at any given meeting a member might agree that the summary statement made by the Chair toward the end of the meeting reflected the consensus accurately. Nevertheless, the consensus might not reflect the member's personal views. In other words, a member might agree that the Chair had stated the consensus accurately, but nevertheless he might not agree with the consensus. This raised the question whether the procedure followed at Open Market Committee meetings should be changed somewhat.

Chairman Martin commented that it was difficult to take a position that where an individual felt strongly about the matter he should be denied the right to have his position explained in the policy record. On the other hand, he felt that it was something of a disservice not to have votes included in the policy record that would speak pretty much for themselves, unless it was decided to follow a procedure of
publishing the entire minutes of the meetings. It appeared to him that an effort to present personal views on a piecemeal basis would only tend to muddy the stream.

Governor Shepardson commented that he could recall a number of occasions when one or more members obviously had views somewhat different from the consensus. He felt a review of minutes would disclose quite a number of cases where individuals might want to have their views recorded if a procedure such as suggested by Governor Robertson were followed.

The Chairman then stated again that the recording of dissenting votes would seem to him to be the most straightforward procedure, following which he inquired of Governor Robertson whether the latter would be willing to go along on this basis as far as the policy record for 1960 was concerned.

Governor Robertson replied in the negative, stating that he had thought about the matter carefully and believed a member of the Committee in his position had a right to be recorded. After going over the minutes thoroughly, he felt that at the two meetings in question the difference between his views and those of the majority was sufficient to warrant this procedure. He did not feel that any member of the Committee ought to be precluded from expressing himself in the policy record if he felt strongly enough about the matter.
The Chairman then turned to the other members of the Board, and Governors Mills and Shepardson stated that they would vote against including in the policy record the statements that had been suggested by Governor Robertson for inclusion in the entries for the Committee meetings on November 22 and December 13. Governor King stated that if the Board should decide to publish the entire minutes for the year in the policy record, he would go along with that decision, although in his opinion such a procedure would not be desirable. That would be the only basis on which he would approve the inclusion of individual comments, except in explanation of a negative vote, and in the absence of such a decision he would vote in the same manner as Governors Mills and Shepardson. Governor Szymczak said that although he recognized the point made by Governor Robertson, he doubted whether the suggested procedure would be in accord with what the Congress had intended when it specified that a policy record was to be furnished. Instead, he felt that the intent was to require a record of what the Open Market Committee had done and the reasons for the Committee's actions, along with reasons for dissenting votes. It appeared to him that any different procedure would be likely to involve many problems, and therefore he would vote against including the statements suggested by Governor Robertson. In reply to a question raised by the Chairman, Governor Szymczak said that he would favor publication of the minutes
of the Committee for some past period. Governor Balderston said that he had sympathy with the points raised by Governor Robertson, but that he thought the basic question was whether to publish the minutes. As to that possibility, he felt that there might be a serious question about publishing the minutes on any current basis. In any event, unless such a step was taken he would favor adhering to the procedure currently followed in compiling the policy record. Chairman Martin indicated that he also would favor adhering to the current procedure. As to the minutes, he concurred in the view that difficulties might be presented by publication on a current basis. However, he saw merit in publishing the minutes for some past period. There appeared to be an increasing tendency to question whether the Federal Reserve System could operate effectively within its present framework, and he felt that the minute record was fairly impressive in that regard.

Mr. Young then referred to a question concerning the wording used by Mr. Hayes, President of the Federal Reserve Bank of New York (and Vice Chairman of the Committee), in explaining why he did not vote to approve the renewal of the Committee's continuing operating policies at the meeting on March 22, 1960. The wording suggested by Mr. Hayes implied that the Committee had voluntarily "tied its hands" in adopting the policy statements used since 1953, whereas the Committee had not felt that such was the case.
A change in language was suggested which would make it clear that the dissenting vote was based on an opinion held by Mr. Hayes, and it was understood that Mr. Young would inquire whether the revised language would be agreeable to Mr. Hayes.

The policy record of the Federal Open Market Committee for the year 1960 then was approved for inclusion in the Annual Report for the Board of Governors for 1960 in the form of the revised draft submitted with Mr. Young's memorandum of January 31, 1961, subject to clearance with Mr. Hayes of the revised language suggested at this meeting in connection with the explanation of his negative vote on the action taken on March 22, 1960, renewing the continuing operating policies.

The action approving the policy record was taken subject to the understanding that Governor Robertson dissented from the decision not to include in the policy record entries for November 22 and December 13 the statements that he had proposed in explanation of his position in voting to approve the directives issued by the Committee at those meetings.

The meeting then adjourned.

Secretary's Note: Governor Shepardson today approved on behalf of the Board a letter to the Federal Reserve Bank of Cleveland (attached Item No. 2) approving the designation of 15 persons as special assistant examiners.
Board of Directors,
Riverside Trust Company,
Hartford, Connecticut.

Gentlemen:

The Board of Governors of the Federal Reserve System, after consideration of all factors set forth in section 18(c) of the Federal Deposit Insurance Act, as amended by the Act of May 13, 1960, and finding the transaction to be in the public interest, hereby consents to the merger of Broad Brook Bank and Trust Company, East Windsor, Connecticut, with and into Riverside Trust Company, Hartford, Connecticut, under the charter and title of the latter. The Board of Governors also approves the operation of a branch by the resulting bank at Broad Brook, East Windsor, Connecticut.

This approval is given provided (1) the proposed merger is effected within six months from the date of this letter and substantially in accordance with the Agreement of Merger approved by the boards of directors of both banks on December 1, 1960, and (2) shares of stock acquired from dissenting shareholders are disposed of within six months from date of acquisition.

Very truly yours,

(Signed) Kenneth A. Kenyon

Kenneth A. Kenyon, Assistant Secretary.
Mr. Paul C. Stetzelberger, Vice President,
Federal Reserve Bank of Cleveland,
Cleveland 1, Ohio.

Dear Mr. Stetzelberger:

In accordance with the request contained in your letter of January 27, 1961, the Board approves the designation of the following employees as special assistant examiners for the Federal Reserve Bank of Cleveland:

Arthur Paul Braham
Stephan J. Brown
Paul Chernutan
Tracy Herrick
Harry R. Jackson
William M. Kasper
G. Must
Norman W. Novak
John M. Schaffer
John J. Scharf
R. Shoewalter
Mary F. Thielman

The Board also approves the designation of the following employees as special assistant examiners for the Federal Reserve Bank of Cleveland for the purpose of participating in examinations of banks except those listed opposite their names:

C. A. Harmon - Society National Bank of Cleveland, and
The Cleveland Trust Company, Cleveland, Ohio.

Peter Vavruska - The National City Bank of Cleveland, and
The Cleveland Trust Company, Cleveland, Ohio.

Robert Olesen - The National City Bank of Cleveland,
Cleveland, Ohio.

Very truly yours,

(Signed) Kenneth A. Kenyon

Kenneth A. Kenyon,
Assistant Secretary.