

3601 Vincennes Road, Indianapolis, Indiana 46268
Phone: 317.875.5250 | Fax: 317.879.8408

www.namic.org

20 F Street, NW, Suite 510, Washington, D.C. 20001
Phone: 202.628.1558 | Fax: 202.628.1601

December 15, 2016

Robert deV. Frierson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW.
Washington, DC 20551

**Re: FEDERAL RESERVE SYSTEM 12 CFR Chapter II [Docket No. R-1550] RIN
7100-AE 61 Enhanced Cyber Risk Management Standards**

Mr. deV. Frierson:

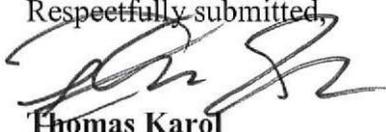
The National Association of Mutual Insurance Companies (“NAMIC”) is the largest property/casualty insurance trade association in the country, serving regional and local mutual insurance companies on main streets across America as well as many of the country’s largest national insurers. The 1,400 NAMIC member companies serve more than 170 million auto, home and business policyholders and write more than \$225 billion in annual premiums, accounting for 50 percent of the automobile/homeowners market and 32 percent of the business insurance market.

NAMIC appreciates the opportunity to provide comments on the above referenced advance notice of proposed rulemaking (ANPR) regarding enhanced cyber risk management standards (enhanced standards) for large and interconnected entities under the respective agencies’ supervision. The issues raised by many of the 39 questions contained in the ANPR are highly complex and as such should be considered with substantive feedback from all stakeholders.

Given the complexity of the matter and the variety and depth of the questions posed, we respectfully request that the comment period for this ANPR be extended for a 60-day period to March 17, 2017. We will need the additional time to adequately consider and provide the comments and answers to the questions posed in the ANPR.

Thank you for your time and consideration. If you have questions or comments, please feel free to contact me at 202-628-1558, tkarol@namic.org.

Respectfully submitted,



Thomas Karol
Federal Affairs Counsel
National Association of Mutual Insurance Companies
122 C St NW, Suite 540, Washington, D.C. 20001
The difference is in the experienceSM