

WISCONSIN BANKERS ASSOCIATION, ROSE OSWALD POELS

Proposal and Comment Information

Title: EGRPRA: Rules of Procedure; Safety and Soundness; and Securities, OP-1828

Comment ID: FR-0000-0117-03-C18

Submitter Information

Organization Name: Wisconsin Bankers Association

Organization Type: Company

Name: Rose Oswald Poels

Submitted Date: 03/11/2025

Please see attached WBAs Comments regarding EGRPRA.



March 11, 2025

VIA E-MAIL ONLY

Chief Counsel's Office,
Attention: Comment Processing,
Office of the Comptroller of the Currency
400 7th Street SW,
Suite 3E-218,
Washington, DC 20219

Ann E. Misback,
Secretary,
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW,
Washington DC 20551

James P. Sheesley,
Assistant Executive Secretary,
Attention: Comments—RIN 3064—ZA39
Federal Deposit Insurance Corporation,
550 17th Street NW,
Washington, DC 20429

RE: Regulatory Publication and Review Under the Economic Growth and Regulatory Paperwork Reduction Act of 1996; RIN 3064-ZA39

To Whom It May Concern,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 200 state and nationally chartered banks, savings banks, and savings and loan associations of all sizes located in Wisconsin, their branches, and over 30,000 employees. WBA appreciates the opportunity to comment on the Office of the Comptroller of the Currency, Treasury; Board of Governors of the Federal Reserve System, and Federal Deposit Insurance corporation's (collectively, the agencies) review of agency regulations to identify outdated or otherwise unnecessary regulatory requirements (review).

The agencies have undertaken this review pursuant to the requirements of the Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA). Over approximately two years, the agencies will publish four Federal Register documents requesting comment on multiple categories of regulations. In this third review, the agencies have requested comment on regulations in the categories of Rules of Procedure, Safety and Soundness, and Securities. WBA submits the following comments to assist with the EGRPRA regulatory review process of evaluating regulations and to identify opportunities for burden reduction.

WBA urges the agencies to work together through the EGRPRA process to ensure consistency in their approach. Wisconsin banks are committed to ensuring procedural expectations, such as record retention requirements are met, maintaining up to date internal programs, policies, and procedures, to meet and exceed safety and soundness expectations, and follow applicable securities regulations. WBA also emphasizes the need for providing the banking industry with clear, comprehensive, and consistent guidance and supervision. Consistency in both interpretation and enforcement is essential to help financial institutions navigate their



compliance obligations effectively and reduce uncertainty. As WBA recommended in its previous letter, through this review process, we encourage the agencies to consider steps to assist through streamlining, simplification, and impactful burden reduction.

Conclusion

WBA appreciates the opportunity to comment on the EGRPRA process and continue to work with the agencies to find ways to reduce regulatory burden consistent with the shared goal of ensuring that bank operations are conducted in a safe and sound manner while enhancing the ability of banks to serve their customers. WBA hopes the agencies will continue to work with the industry to keep mounting costs and regulatory burdens in mind.

Once again, WBA appreciates the opportunity to comment.

Respectfully,

A handwritten signature in black ink, reading "Rose Oswald Poels".

Rose Oswald Poels
President/CEO