

WISITH TUN-YHONG

Proposal and Comment Information

Title: BGFERS-14 General File of Reserve Bank and Branch Directors, SORN-202601

Comment ID: FR-2026-0003-01-C05

Submitter Information

Name: Wisith Tun-yhong

Submitted Date: 03/18/2026

Formal Public Comment: Modification of BGFRS-14

To: The Board of Governors of the Federal Reserve System

Subject: Analytical Appraisal of SORN-202601 regarding the General File of Reserve Bank and Branch Directors

I. Institutional Preamble

The proposed modernization of the BGFRS-14 system of records is a salient development in the evolution of the Federal Reserve's governance architecture. As the Board seeks to refine the mechanisms governing the appointment of Class C and Branch directors, it is paramount that the resultant data framework adheres to the dual mandates of Privacy Act compliance and the maximization of institutional meritocracy. The following observations are submitted to ensure that the modifications uphold the teleological goals of the Federal Reserve Act.

II. On the Ontology of Director Eligibility and Conduct

The expansion of the system to encompass the "eligibility, conduct, and service" of all directors necessitates a sophisticated approach to Data Lineage and Information Integrity.

- **Algorithmic Neutrality in Selection:** As the Board implements these updates, it is crucial to delineate the parameters by which qualitative data regarding "conduct and service" is codified. In the absence of rigorous semantic standards, the system risks the introduction of subjective variability that could inadvertently influence the composition of Reserve Bank boards.

- **Inter-Node Interoperability:** Given the sophisticated nature of contemporary financial oversight, the Board should clarify the extent to which BGFRS-14 integrates with external telemetry and professional vetting endpoints. Ensuring that the "interactions among the Board and the Federal Reserve Bank" are recorded within a non-repudiable framework is essential for maintaining the sanctity of the deliberative process.

III. Recommendations for Data Governance and Transparency

To bolster the efficacy of the BGFRS-14 modification, the following structural enhancements are suggested:

1. **Temporal Granularity:** Establish definitive retention schedules that distinguish between active service records and archival historical data, thereby minimizing the surface area for potential data exfiltration or unauthorized access.

2. **Access and Rectification Protocols:** In accordance with the Privacy Act, the Board must ensure that the "appointment and eligibility" data remains dynamic, allowing for real-time rectification by the subjects to reflect evolving professional credentials and compliance statuses.

3. **Proportionality of Collection:** The Board is encouraged to utilize a principle of Data Minimization, ensuring that the collection of personal identifiers remains strictly proportional to the administrative necessity of managing Branch directorate compositions.

IV. Concluding Remark

In conclusion, while the modification of BGFRS-14 is an indispensable step toward administrative optimization, the Board must remain vigilant in safeguarding the equilibrium between institutional oversight and individual privacy. A robust, transparent, and digitally resilient system is the bedrock upon which the credibility of the Federal Reserve's leadership selection rests.

Respectfully submitted,

Prof. Dr. Wisith Tun-yhong