

STEPHEN REYES

Proposal and Comment Information

Title: Proposed Third-Party Risk Management Guide for Traditional Community Banking Organizations, OP-1880

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Submitter Information

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The proposed guide discusses core processors, cybersecurity, fraud, payments, AML, and infrastructure providers but contains almost no discussion of artificial intelligence vendors.

Given the rapid adoption of generative AI, machine-learning tools, customer-service automation, and AI-assisted compliance solutions, the final guide should include a dedicated section addressing AI-related third-party risks, including data governance, model transparency, explainability, intellectual property concerns, and customer information protection.