AMERICAN BANKERS ASSOCIATION, ET. AL.

Proposal and Comment Information

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

Comment ID: FR-2026-0030-01-C19

Subject

Docket No. OP–1880

Submitter Information

Organization Name: American Bankers Association, et. al.

Organization Type: Organization

Submitted Date: 10/29/2026

Please find attached the joint comment letter from the American Bankers Association, Bank Policy Institute, Consumer Bankers Association and Independent Community Bankers Association on Docket No. OP–1880. For questions, please contact ABA's Krista Shonk at kshonk@aba.com<mailto:kshonk@aba.com>.

Thank you,
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We are sending you this e-mail primarily for your information, to meet your needs and further our valued relationship. If you prefer not to receive any further messages from us, just reply to this e-mail and let us know. Thanks.

American Bankers Association 1333 New Hampshire Ave NW Washington DC 20036

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October 29, 2026

Jennifer M. Jones
Deputy Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
ZRIN 3064-ZA58

Benjamin W. McDonough
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
Docket No. OP–1881 and Docket No. OP–1880

Chief Counsel's Office
Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street SW, Suite 1E-216
Washington, DC 20219
Docket ID OCC–2026–0793; RIN 1557–ZA18

Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314–3428
Docket No. NCUA-2026-1684; RIN 3133-ZA54

Re: Request for a 30-Day Extension of the Comment Period for Proposed Third-Party Risk Management Guidance

To Whom It May Concern:

On September 15, 2026, the Federal Deposit Insurance Corporation, the Federal Reserve Board, the Office of the Comptroller of the Currency, and the National Credit Union Administration (collectively, "the Agencies") requested comment on proposed revisions to the *Interagency Third-Party Risk Management Guidance* ("Interagency Proposal").[1] That same day, the Federal Reserve also requested comment on its *Proposed Third-Party Risk Management Guidance for Community Bank Organizations* ("Federal Reserve Proposal").[2] Comments on both proposals are due on November 16, 2026. The undersigned trade associations respectfully request a 30-day extension of these comment periods.

The proposals contain several helpful elements, such as a more focused scope and an emphasis on risk-based tailoring. However, initial feedback from bankers representing institutions of all sizes has included observations that warrant additional discussion and analysis. In particular, members have raised questions regarding how the proposed approach could affect due diligence and contracting in practice. In addition, third-party risk management guidance and policy impact a number of risk disciplines within

[1] 91 Fed. Reg. 58536 (September 15, 2026).
[2] 91 Fed. Reg. 58438 (September 15, 2026).

each banking organization, including cybersecurity, resilience, privacy, and compliance, among others. Additional time would allow our associations to engage in more thorough discussions with our members to formulate constructive comments on the proposals.

In addition, some of the undersigned associations intend to comment on both the Interagency Proposal as well as the Federal Reserve Proposal, which are due on the same day. An extension would help those associations and their members fully consider how the two proposals would interact and whether they would operate as intended. The timing of these proposals also comes amid a particularly active regulatory agenda that has required banks and trade associations to devote substantial resources to multiple significant regulatory matters. In light of these competing demands, a modest extension would provide the time necessary to undertake a careful analysis of both proposals and provide the Agencies with more fulsome comments.

Thank you for considering this request.

Sincerely,

American Bankers Association
Bank Policy Institute
Consumer Bankers Association
Independent Community Bankers Association