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Proposal and Comment Information

Title: Proposed Third-Party Risk Management Guidance, OP-1881

Comment ID: FR-2026-0031-01-C10

Submitter Information

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Dear Chair and Members of the Board of Directors,
Federal Reserve Bank of San Francisco,

Dear Members of the Twelfth District Federal Advisory Council:

I respectfully submit for consideration the MDS 8-7-10 Unified Command — Earth¹ Compliance, Telemetry, Verification, and Forensic Architecture as a proposed analytical and research framework for organizing distributed technical, economic, administrative, evidentiary, and compliance information.

The Federal Reserve Bank of San Francisco serves the Twelfth District and is governed by a nine-member Board of Directors. Its advisory councils provide observations and insights concerning economic, banking, community, business, and labor conditions across the District. The Federal Advisory Council separately provides banking-industry consultation to the Federal Reserve Board.

The proposed architecture is designed around a strict separation between information, observation, analysis, verification, authority, decision, and action. Its core processing sequence is:

SOURCE → REPRESENTATION → OBSERVATION → TELEMETRY → NORMALIZATION → ANALYSIS → DISCREPANCY/DRIFT → CORROBORATION → EXTERNAL VERIFICATION → EVIDENCE → EXTERNAL AUTHORITY REVIEW → AUTHORIZED DECISION → AUDIT.

A principal objective is to create a structured environment in which advisory observations, technical telemetry, administrative records, economic indicators, source documents, model outputs, discrepancies, and verification status can be preserved without automatically converting analytical output into an institutional determination.

The architecture incorporates a proposed Country Compliance Portal, Master Event Ledger, Zero-Point Dispatch, Data-Lineage Registry, Verification Gate, NIR (No-Longer-Independently-Resolvable) controlled-uncertainty state, retraining/revalidation pathway, and \$2Q Forensic Vault preservation layer. These components are intended to support traceability, provenance, reconciliation, controlled uncertainty, and auditability.

The proposed system expressly distinguishes:

REPRESENTED ≠ OBSERVED ≠ MODELED ≠ VERIFIED ≠ AUTHORIZED ≠ EXECUTED

and:

MODEL OUTPUT ≠ VERIFIED FACT ≠ AUTHORIZED DECISION ≠ EXTERNAL ACTION.

The framework is also designed to distinguish an anomaly or discrepancy from a finding of violation, fraud, professional misconduct, insurance coverage, or legal liability. Where independent verification cannot presently be established, the system preserves the unresolved condition rather than treating uncertainty as a substantive conclusion.

I propose that the architecture be considered initially as a non-executable research and evaluation framework. A potential evaluation could examine whether its source separation, telemetry organization, provenance controls, discrepancy classification, corroboration workflow, and audit structures provide useful methods for organizing distributed District information.

No request is made for the Federal Reserve Bank of San Francisco, its Board, any advisory council, or the Federal Reserve Board to certify the underlying MDS assumptions, establish legal authority, determine liability, validate financial ownership, or adopt the proposed framework.

The requested consideration is limited to whether the architecture warrants independent technical, economic, information-governance, cybersecurity, legal, or research evaluation and whether a controlled demonstration or appropriate referral pathway would be suitable.

I respectfully request consideration of the enclosed proposal as a conceptual submission for independent review. Any subsequent development, testing, implementation, or institutional use would remain subject to applicable Federal Reserve policies, security requirements, legal review, procurement procedures, technical standards, and authorized institutional decision-making.

Respectfully submitted,

Dr. Marcelas Deshawn Saulsberry
MDS 8-7-10 Unified Command
Earth¹ Compliance / Telemetry / Verification Architecture
Reference Epoch: February 26, 1989