

# APERION, CRAIG ALBERINO

## Proposal and Comment Information

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

**Comment ID:** FR-2026-0031-01-C23

## Submitter Information

**Organization Name:** Aperion

**Organization Type:** Organization

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October 20, 2026

Chief Counsel's Office  
Attention: Comment Processing  
Office of the Comptroller of the Currency  
Docket ID OCC-2026-0793

Benjamin W. McDonough, Secretary  
Board of Governors of the  
Federal Reserve System  
Docket No. OP-1881

Jennifer M. Jones, Deputy Executive Secretary  
Attention: Comments, ZRIN 3064-ZA58  
Federal Deposit Insurance Corporation

Melane Conyers-Ausbrooks, Secretary of the Board  
National Credit Union Administration  
Docket No. NCUA-2026-1684

**Re: Clarification, Proposed Third-Party Risk Management Guidance, 91 FR 58536**

Ladies and Gentlemen:

APERION submits this clarification of its supplemental comment of October 15, 2026.

That comment described another commenter's proposal as providing for records of an AI system's individual actions, and stated that records of actions do not show what customer information a banking organization sent to a third party or to the model provider behind it. The proposal is more specific than our description. For AI systems that can prepare, initiate or approve transactions, it would include in those records the information the system acted on and which underlying model acted. We should have said so.

Our point is narrower. Many AI services a banking organization uses do not transact. They draft, summarize, classify or answer, and still send customer information to the third party, often on to a model provider behind it. We suggest that the approach that commenter proposed extend to those services, at the level of categories of information rather than full content, as set out in our suggested language for Section B.2.iii, which is unchanged.

On per-request model routing, a record identifies the provider only after the information has reached it. We therefore continue to recommend disclosure of the set of providers that may receive the banking organization's information, with notice before one is added, as set out in our suggested language for Section B.2.v.

Respectfully submitted,

**Craig Alberino**  
Chief Executive Officer  
Aperion, Inc.