THOMAS AI LLC, PRISCILLA VILLANUEVA, ET. AL.

Proposal and Comment Information

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

Comment ID: FR-2026-0031-01-C67

Subject

Docket No. OP-1881: Sub-1 ms AI-Agent & Vendor Shield

Submitter Information

Organization Name: Thomas AI LLC

Organization Type: Company

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Submitted Date: 11/19/2026

Dear Secretary of the Board and Federal Reserve Financial Stability & Supervision Leadership,

Thomas AI LLC—an independent, 100% self-funded American technology company in New Braunfels, Texas, founded and wholly owned by two native-born U.S. citizens with zero Foreign Ownership, Control, or Influence (FOCI), zero offshore code, zero debt, and zero corporate boards—submits this non-confidential comment under Docket No. OP-1881 (Proposed Third-Party Risk Management Guidance) and in support of Governor Michael Barr's November 16, 2026 financial-stability address on autonomous AI agents.

This week validated both Federal Reserve supervisory concerns simultaneously: (1) on November 19, third-party vendor ransomware compromises exposed customer contact and benefit records across JPMorgan Chase, Visa, and Mastercard even though core bank networks were unbreached; and (2) on November 16, rushed security-patch deployments disrupted online banking across major U.S. lenders, while five major banks now block external AI agents over unauthorized retail-account actions and minute-scale deposit-outflow risks.

Protected by 33 patent-pending U.S. Patent Applications and backed by 485 verified mathematical theorems, our 100% local, zero-cloud runtime safety boundary demonstrates that supervised institutions can achieve the exact outcomes Governor Barr outlined—strict authentication, explicit customer consent, hard velocity limits, and replicable decisions—without vendor PII copies or patch-induced outages:

1. Velocity & Consent Limits Stopping Minute-Scale AI Bank Runs (Under 1.0 Millisecond): Enforces non-bypassable, customer-authenticated permission and transfer-rate ceilings in under 1.0 millisecond (0% unauthorized AI agent authority) across any model—preventing synchronized multi-agent herding and unauthorized retail account actions.

2. Eliminating Third-Party Vendor PII Exposure: Keeps raw customer names, emails, and account records inside the institution's boundary so external marketing, loyalty, or service breaches expose zero raw depositor PII.

3. Sub-50 Microsecond Legacy Patch-Surge Isolation & 90+ Day Continuity: Shields aging banking systems against AI-discovered vulnerabilities while containing update-handoff surges in under 50 microseconds, cutting wasted AI/compute power by up to 85.4%, and sustaining 2,160+ hours of local operation at $0 cloud cost.

Per Board public-comment rules, this submission contains zero confidential design information and reserves all Thomas AI LLC intellectual-property rights. Separate supervisory technology briefings under Mutual NDA may be requested via priscillav@thomas-ai.net<mailto:priscillav@thomas-ai.net>.

Respectfully,

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