Meeting Between Staff of the Federal Reserve, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency, and Representatives of The Clearing House Payments Company, LLC
March 8, 2021

Participants: Stuart Sperry, Julia Philipp, Don Peterson, Jay Schwarz, Claudia Von Pervieux, Evan Winerman, Emily Caron, Kathy Wang, and Cory Hansen (Federal Reserve Board); Lisa Joniaux and Karen Kahrs (Federal Reserve Bank of New York)

Edward Dowling, Carl Kaminski, Jason Kang, and Karee Payton (Office of the Comptroller of the Currency)

John Dorsey, Robert Drozdowski, and Graham Rehrig (Federal Deposit Insurance Corporation)

David Drossman, Alaina Gimbert, Stephanie Heller, Bryan Kanefield, Kelsey Penrose, and Russ Waterhouse (The Clearing House Payments Company, LLC)

Summary: Staff of the Federal Reserve Board, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency (collectively, the agencies), and the Federal Reserve Bank of New York met with representatives of The Clearing House Payments Company, LLC (TCH) to discuss the agencies’ notice of proposed rulemaking on Computer-Security Incident Notification Requirements for Banking Organizations and Their Bank Service Providers (Docket No. R-1736, RIN 7100-AG06). TCH representatives discussed the following aspects of the proposed rulemaking: (i) the scope of the rule; (ii) the purpose of the notification requirement for bank service providers; (iii) the definition of notification incident; (iv) the acceptability of automated notification systems; and (v) the timeframe for notification.