



September 18, 2025

Submitted via Federal eRulemaking Portal: <https://www.regulations.gov>

Submitted via Email to: comments@fdic.gov

Submitted via Email to: publiccomments@frb.gov

Office of the Comptroller of the Currency
400 7th Street, SW, Suite 3E-218
Washington, DC 20219

Federal Reserve Board of Governors
2001 C Street NW
Washington DC, 20551

Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Request for Information on Potential Actions to Address Payments Fraud
Docket ID OCC-2025-0009; Docket No. OP-1866; RIN 3064-ZA49

To whom it may concern:

ADP, Inc. ("ADP") appreciates the opportunity to provide comments in response to this important matter. Fraud continues to present a significant and evolving challenge for banks and payment service providers, often resulting in material financial losses to institutions and their clients.

ADP is one of the world's largest providers of business outsourcing and human capital management solutions. ADP facilitates the movement of more than \$3.3 trillion annually to employees, tax authorities, and other payees in the United States. Certain aspects of the request are not directly applicable to ADP's business model, as such, we have limited our comments to the issues most relevant to our operations and experience.

As fraud threats are increasingly sophisticated and pervasive, ADP believes that a coordinated, systemic response is essential. We respectfully submit the following recommendations for consideration:

1. Establishment of a Centralized Fraud Intelligence Hub

We recommend the establishment of a centralized hub for the payments ecosystem where public- and private-sector participants, including non-bank payment providers such as payroll processors and fintech firms who may have distinct visibility into fraud schemes, could securely share emerging fraud trends and attack patterns by payment type (e.g., check, ACH, wire transfers, card payments) within a



privacy-protected framework. For example, 314(b) provides registered participants the opportunity to share specific discrete instances of suspicious activity with each other. Perhaps a complementary instance could be created utilizing the same participation platform to discuss experiences in a more general manner to the broader audience of all registered participants. Utilizing standardized definitions for known fraud and scam typologies within this hub would further enhance the quality, consistency, and comparability of reporting, enabling more effective aggregation, analysis, and mitigation of fraud risks across the ecosystem. Broader participation in such an effort would help ensure that intelligence is as comprehensive as possible and that prevention and detection strategies are as effective as possible.

2. Development of Coordinated Education and Awareness Campaigns

ADP strongly supports enhanced education of consumers, businesses, and industry stakeholders as a critical tool to prevent fraud and reduce losses. We recommend the development of coordinated, standardized educational campaigns across payment types and industries. These campaigns should highlight prevalent fraud typologies and provide actionable guidance for both institutions and customers. Any reporting of anonymized outcomes from educational initiatives that have demonstrably reduced fraud exposure should be shared to allow replication of effective practices across the sector.

ADP is committed to strengthening the resilience of the U.S. financial system against fraud, including supporting the development of frameworks that permit coordinated and systemic responses. We appreciate the leadership on this matter and welcome the opportunity to provide further input or clarification as needed.

Sincerely,


Dave Martin

Corp. VP, Global Security Officer