

From: [Stephanie Preza](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date: Monday, September 15, 2025 10:45:36 AM
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Ms. Jennifer M. Jones
Deputy Executive Secretary
Attention: Comments—RIN 3064-ZA49
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Ms. Jones, Mr. McDonough, and Mr. Gould:

I am the Vice President of American National Bank Fox Cities a community bank located in Appleton, WI. I am writing to respond to the Office of the Comptroller of the Currency (OCC)'s, Board of Governors of the Federal Reserve System (Board)'s, and Federal Deposit Insurance Corporation (FDIC)'s request for information (RFI) on payments fraud.

Since 1993, American National Bank Fox Cities has been helping business owners in the Fox Valley beat the odds by offering lending and deposit services. While smaller businesses are often ignored, community banks take the time to listen and hear what those in our community need. We look at loans that large banks might view as too small or too young. We provide services at lower costs to help those businesses not only survive but thrive.

I applaud the agencies for issuing this RFI and seeking input on ways that the OCC, the Federal Reserve System (FRS), and the FDIC could take actions to help consumers, businesses, and financial institutions mitigate payments fraud. Community banks continue to be challenged by a rise in fraud and scams across payment types, so agency action is much needed.

Specifically, the Bank has been affected by payments fraud in the following ways:

- There is a constant uptick in washed checks being stolen from mail points. Our businesses mail checks believing that they are received by vendors only to learn that

they have been intercepted and payees/amounts have been changed.

- Fraudulent ACH transfers are being presented with increased frequency creating a bottleneck for clients who can't wait for the bank to return funds. These fraudulent transactions are discovered when clients are needing the funds for payroll or vendor payments.

We need additional support in Regulation and Supervision.

- Broadly speaking, payments fraud regulations and examiner expectations need to be appropriately tailored to community banks with tiered compliance requirements and deadlines. There are opportunities to enhance supervisory guidance around appropriate controls, suitable technology, reporting, and incident response, but it is important to avoid imposing new burdens on community banks.
- Check fraud remains a significant issue. Community banks are concerned that some large financial institutions are not exercising sufficient CIP/KYC processes and opening accounts that are being leveraged by fraudsters. Similarly, community banks have had significant difficulty resolving interbank disputes regarding fraudulent checks. Larger financial institutions are often placing claims to reviewed 30 -90 days after their receipt. We have trouble reaching someone who can speak to claims or a complete unwillingness to assist in recovery.
- Changes to Regulation CC could help community banks prevent and mitigate check fraud. For example, the return deadline related to fraud could be extended, the "reasonable cause to doubt collectability" exception could be clarified, and relevant definitions could be revised (e.g., "altered" and "alteration"). However, hold times should not be shortened; they are an essential tool for banks to detect and prevent check fraud. Financial institutions should have flexibility to extend hold times under appropriate circumstances.

Thank you for the opportunity to provide comments on this RFI. The Bank looks forward to continuing to work with the OCC, FRS, and FDIC and other stakeholders to protect our clients and communities from the growing threat of payment fraud.

Sincerely,



Stephanie Preza, NCP

Vice President - Deposit Operations

American National Bank Fox Cities



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