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Posted by the **Comptroller of the Currency** on Nov 17, 2025

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Comment

We submit this comment in support of the proposed Prohibition on Use of Reputation Risk by Regulators. We believe that the elimination of “reputation risk” from the existing regulations would help to eliminate subjectivity in the examination of banks and allow the regulatory agencies to focus on more measurable standards.

However, as a group of university students reviewing this proposed rule from an outside perspective, we believe changing the formatting of this rule would allow it to be more understandable, in accordance with section 722 of the Gramm-Leach-Bliley Act. Subheadings within the two major headings of the proposed rule would assist with clarity and help the readers to reference important sections of the rule, such as definitions of important terms within the proposed rule.

Regarding the terms “reputation risk” and “adverse action”, we felt the definitions were sufficiently detailed and understandable, even by people outside of this industry. Broadening or narrowing these definitions could cause confusion or cause the proposed rule to be less effective. We believe the word “solely” should be included in the phrase “solely on the basis of the third party's involvement in lawful business activities that are perceived to present reputation risk.” More ambiguous language could leave too much room for interpretation.

Give Feedback

Respectfully,
Students of Dordt University

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