

**From:** [Tiffany Suggs](#)  
**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 10:58:50 AM

---

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:

**Re: Industry Fraud Trends and Mitigation Strategy**

Dear Sir or Madam:

On behalf of The Citizens Bank, I am writing to acknowledge the continuing rise in fraud trends affecting financial institutions nationwide and to outline the initiative-taking steps I feel the FDIC should review to help mitigate these risks while safeguarding customers and the broader banking system.

Fraud mitigation is an ongoing priority at The Citizens Bank and other financial institutions. Enhanced guidance from the FDIC and Bank Regulators is needed to assist all financial institutions. Suggestions for enhanced guidance and changes to NACHA Rules and UCC is desperately needed in the following areas:

- Time limits established for resolving Breach of Warranty Claims. The current UCC does not require FI's to respond within a specified period of time. We are constantly having to send multiple requests to even get an acknowledgement. Many claims go eight to ten months before an acknowledgement or receipt of funds due. We are also seeing large FI's deny valid breach of warranty claims because they fall under the FI's threshold with is not a valid denial. A reporting system for FI's that fail to respond or remit funds due to valid Breach of Warranty Claim is needed.
- UCC's only provide a 24-hour time limit for forged maker or counterfeit checks. These are based on decade old practices of manual review of items and check sorting that are not in line with current bank practices and automation. These time frames should be extended and the UCC updated to be in line with current industry practices.

- NACHA rules for CDD transactions provide a 24-hour return time. This should be extended as well as requirements for FI's that receive claims to aid in identifying the fraudulent originator. NACHA does have a process in place for requests, but like Breach of Warranty claims, they go unanswered.

The Citizens Bank remains committed to ensuring a safe and sound banking environment for our customers and the communities we serve.

Thank you for your continued leadership in supporting the stability and security of the banking system.

DISCLAIMER: This message is intended only for specified recipients. If you are not the intended recipient you are notified that disclosing, copying, distributing, or taking any action in reliance on the contents of this information is strictly prohibited. This communication represents the originator's personal views, which may not reflect those of The Citizens Bank. Security Warning: This message is being sent over an unsecured medium (the Internet). Recipients should not reply to this message with sensitive or confidential account information. If the need arises to communicate sensitive or confidential account information, customers should visit or contact the nearest branch office. If you received this email in error, please immediately notify p [REDACTED].

This message was secured by Zix®.