

From: [Michelle Deutmeyer](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date: Tuesday, August 26, 2025 5:14:03 PM
Attachments: [image001.png](#)

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 CFO of Community Savings Bank, a \$605 million community bank located in Edgewood, Iowa. I am writing to respond to the OCC's, Fed Board's, and FDIC's request for information (RFI) on payments fraud.

Community Savings Bank (CSB) has served local communities for over 100 years. Community banks play an important role in lending to small businesses and consumers in the communities that we serve with our 10 locations. Our 90 employees take pride in volunteering and serving our local schools, community groups and activities.

I applaud the agencies for issuing this RFI and seeking ways that you can take actions to help protect our consumers, businesses, and FI from losses and to mitigate payments fraud. Community banks, in particular, continue to be challenged by the rise in fraud and scams across payment types, so agency action is much needed.

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

- Increase in check fraud (washed checks/ copied cashier's checks/ etc.)
- Wire fraud
- ACH fraud
- External transfer / internet banking fraud
- Many, many customers being contacted via phone and online and scammed into giving their banking information out. (romance scams/ elder abuse/ support scams)

Local and regional collaboration across community banks, federal and state regulators, law enforcement, community organizations, and other stakeholders can be an effective way to build connection and share information at the community level. We support national collaboration, but resource constraints of the community FI will effect at what level we can participate.

Community banks serve elderly customers, as well as consumers and small businesses in rural and agricultural areas, so educational materials tailored to those groups would be valuable. CSB tries to hold customer educational events where we share examples of fraud and what they can do to protect themselves. Any useful material for those sessions would be helpful.

Check fraud, in particular, is becoming a significant issue. Community banks are concerned that some large FI are not exercising sufficient CIP/ KYC processes and opening accounts that are leveraged by fraudsters. In addition, community banks have significant difficulties resolving interbank disputes regarding fraudulent checks or other fraud situations. We have had difficulty getting larger banker sharing information with who is taking the funds on the other side of transactions, or even getting a person to answer the phone and share in the investigations.

Changes to Regulation CC could help community banks prevent and mitigate check fraud. For example, the return deadline related to fraud needs to be extended, the “reasonable cause to doubt collectability” exception could be clarified, and relevant definitions could be revised. Hold times could be lengthened or FI given the opportunity to extend the hold for certain reasons.

Community FI would benefit from automated data collection, analysis and reporting tools that are integrated with services they already use and do not come with additional costs.

Banks would benefit from tools and services that work with software that we already use and are priced according to size or more reasonably.

The inability to share information with other banks, only delays any solutions to the fraud situations and losses.

Time is of the essence as the fraudsters are utilizing technology to work the system faster and faster. We need to be able to identify, isolate, and report the fraud as quickly as possible.

Thank you for the opportunity to provide comments. CSB looks forward to working with all the agencies to protect the consumers and communities from the growing threat of payments fraud.

Sincerely,

Thank you,
Michelle

Michelle M. Deutmeyer
Chief Financial Officer

• <http://www.communitysavings.bank>



**Coming together is a beginning; keeping together is progress; working together is success
- Henry Ford**

Community Savings Bank



Office:



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