

**From:** [Matthew Pope](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)  
**Date:** Thursday, August 28, 2025 11:47:06 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 Market President of First Interstate Bank in Cheyenne Wyoming. 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. I appreciate the opportunity to provide input on fraud. Simply put it is now the overarching topic in most everything we do. I do not understand the regulatory and law enforcement jurisdiction well but is becoming unsustainable to try and keep our customers informed and properly cautions while watching fraud occur regularly and then rarely if ever see any law enforcement outcomes. I consider the following points:

- When fraud occurs and the bank where the fraud originates is notified, our industry is slow to share information to support quick resolution or law enforcement. Locally we have a bank communication group in our county that timely and effectively shares fraud events for awareness but interstate fraud resolution seems to be a black hole where we have difficulty with information sharing. Industry collaboration would be helpful in heading off losses.

After a loss, there never seems to be investigation or enforcement. Banks figure out who will take the loss but we never seem to go after the criminals as an industry and if we do damaged parties do not know about it. Aggressive enforcement and legal penalties need to be moved to the forefront of topics in our society. What level of loss is needed to act and who pursues the cases? Local law enforcement is not equipped or willing to pursue these cases or cannot based on jurisdiction.

- Public awareness would be a huge first line of defense rather than dealing with the aftermath. I see a public service announcement about having a disaster preparedness box in your house over and over, why can't we see repetitive PSA's regarding fraud, is there any more common disaster than a family losing their financial wellbeing to fraud? Put out statistics on the amount of fraud, types of fraud and ways to prevent it. A full-blown national campaign that runs for an extended period of time. Fraud is still seen as a victimless crime as the banks write it off, as we know this is not true.

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.

Sincerely,

Matthew Pope  
NOCO/SOWY Market President

O: [REDACTED]

C: [REDACTED]  
[REDACTED]

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