From:	Jenna Scheeler
To:	Comments
Subject:	[EXTERNAL MESSAGE] Request for Information on Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date:	Monday, September 15, 2025 6:06:42 PM

Mr. Jonathan Gould
Comptroller of the Currency, Office of the Comptroller of the Currency
Docket ID OCC-2025-0009

Mr. Benjamin W. McDonough
Deputy Secretary, Board of Governors of the Federal Reserve System
Docket No. OP-1866

Ms. Jennifer M. Jones
Deputy Executive Secretary, Federal Deposit Insurance Corporation
RIN 3064-ZA49

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

I am the Chief Operating Officer of High Plains Bank, a $440 Million dollar community bank located in Colorado. 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.

High Plains Bank is a family- and employee-owned community bank in Colorado with a history dating back to 1908. It serves several local communities, including Bennett, Flagler, Keenesburg, Wiggins, and Longmont, while also offering digital services nationwide. The bank's history is deeply rooted in its commitment to the local area. This community focus is vital to its role as a lender, as it uses a relationship-based model to provide essential loans to small and medium sized businesses, as well as farmers and ranchers. By reinvesting local deposits back into the community, High Plains Bank helps to foster economic stability and growth, providing crucial support for local entrepreneurs and families that might not receive the same personalized attention from larger, national banks.

I appreciate the agencies 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 on multiple occasions and below are some recommendations:

- We should advocate for more regulation of telecommunications systems to prevent spoofing of text messages and phone calls. Our fraud department has been impersonated which caused the consumer to allow screen scraping and obtaining information in order to make tokenized transactions resulting in the bank taking the loss. This happened despite fraud alerts going to the consumer and the bank having regular notification in place to remind consumers that we don’t ask for sensitive information. Implementing a certificate-based authentication system for business phone numbers would significantly enhance security and customer trust. This would require cooperation among US phone companies and likely regulatory intervention.

- We need a clearer definition of "Unauthorized Transaction" under Regulation E. The current regulation doesn't adequately address "authorized push payment" (APP) scams. We need a distinction between genuinely unauthorized transactions and consumer-authorized transactions induced by fraud. Consumers need to have some liability in their actions and the bank cannot suffer full losses due to negligence or ignorance.

- We need a system that promotes shared liability between financial institutions and consumers, incentivizing consumer vigilance. If a consumer disregards multiple fraud warnings, their liability should be higher. There should be actions financial institutions can take to limit their liability, examples may include proof of notifications or training provided.

- The FDIC should extend liability to all participants in the payments ecosystem, including telecommunications companies that enable fraudulent calls and tech companies that host deceptive social media ads. Financial institutions shouldn't be solely responsible for scams originating on other platforms.

- The FDIC should create a centralized, regulated fraud database where financial institutions can consume and report real-time information on known fraud

accounts, mule accounts, and common scam patterns. This participation should be mandated and affordable, as current ad-hoc information sharing is insufficient.

- The FDIC should take a more active role in public education campaigns to raise awareness about fraud, sharing this burden with financial institutions. High Plains Bank already invests $12,000 annually to provide training content on our website. Joint public awareness campaigns, possibly coupled with the real-time database, would allow for rapid deployment of important announcements. A regulation requiring all payment apps and financial institutions to display a standardized FDIC fraud warning could be beneficial.

- The bank has had multiple instances of check fraud, including check washing and counterfeit checks. These instances require a large drain on our resources and it is very difficult for us to get in touch with the right people at large banks in order to work toward recovery for our consumer. For check fraud, the FDIC should work with the industry to mandate advanced methods to combat check washing and counterfeiting. This could include a centralized database for check issuance information and shared fraud loss burdens for companies that issue unvalidated checks.

In summary, we should urge the FDIC to move from its current narrow and outdated regulatory framework to a more comprehensive, collaborative, and risk-based approach that acknowledges modern payment complexities and distributes fraud-fighting responsibilities more equitably across all stakeholders.

Sincerely,

Jenna Scheeler

Chief Operating Officer
High Plains Bank

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Jenna Scheeler
Integrator/Chief Operating Officer
[redacted]
www.highplainsbank.com
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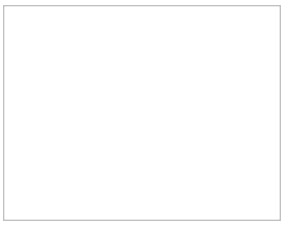

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