

**From:** [Arlene Bonhomme](#)  
**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 22, 2025 9:00:02 AM  
**Attachments:** [image001.png](#)

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

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

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

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

I am writing on behalf of myself, the Director of Compliance, my colleagues the Director of BSA and the Director of Deposit Operations at Maspeth Federal Savings, a large community bank located in Maspeth, Queens, NY. We are 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.

Maspeth Federal Savings opened in 1947 to help locals lay down roots and plan for the future by taking out mortgages and opening savings accounts.

We are one of the most trusted and respected independent financial institutions in this very special Queens community. Today, with over \$2 billion in asset management, we operate six full-service branches and a loan center. Each year, we contribute millions to local charitable institutions and free community events.

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.

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

Check fraud, in particular, remains a significant issue. Community banks are concerned that some large financial institutions are not exercising sufficient CIP/KYC processes and opening accounts that are being leveraged by fraudsters. Similarly, community banks have had significant difficulty resolving interbank disputes regarding fraudulent checks.

Changes to Regulations CC could help community banks prevent and mitigate check fraud. For example, the return deadline related to fraud could be extended, the "reasonable cause to doubt collectability" exception could be clarified, and relevant definitions could be revised (altered & alteration). However, hold times should not be shortened; they are an essential tool for banks to detect and prevent check fraud. Financial institutions should have flexibility to extend hold times under appropriate circumstances.

Thank you.

**Arlene Bonhomme** | Vice President & Director of Compliance  
**Maspeth Federal Savings**

