From: Andy Sanders
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, September 16, 2025 11:16:20 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:

I am the Chief Operating Officer of Planters Bank & Trust Company, a \$2 billion asset community bank in Mississippi, Tennessee, and Louisiana. I am writing in response to the Office of the Comptroller of the Currency's, Board of Governors of the Federal Reserve's and the Federal Deposit Insurance Corporation's request for information on payments fraud.

Our bank is a 105-year-old institution located in one of the most underbanked areas of our country. We take pride in our CDFI status and our efforts to serve all areas of our communities with volunteer support, investments, and technologically advanced loan and deposit products.

I applaud the agencies for issuing this RFI and seeking input on ways that the OCC, Federals Reserve System, and 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:

- Counterfeit checks
- Stolen and altered checks
- CATO attempts
- Clients falling for wire scams
- Debit card fraud

Check fraud remains our largest type of fraud loss. 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. On several occasions, we have had to send an item for return payment multiple times to get a response or received no response at all.

Thank you for the opportunity to provide comments on this RFI. The Bank looks forward to continuing to work with the OCC, FRS, and FDIC, and other stakeholders to protect our customers and communities from the growing threat of payments fraud.

Sincerely,

Andy Sanders, COO

Planters Bank & Trust Company

ANDY SANDERS EVP/CHIEF OPERATING OFFICER



