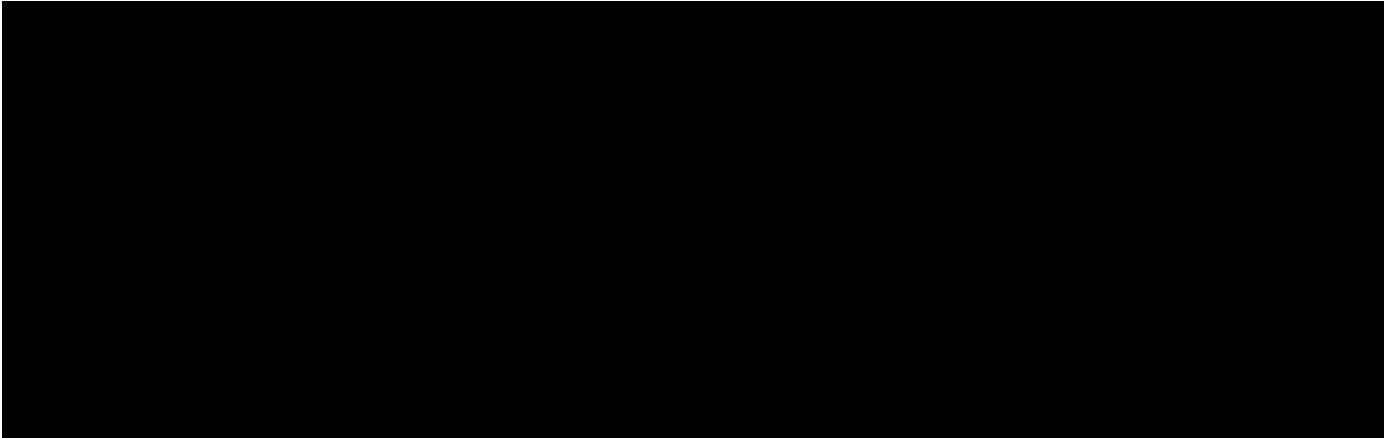


**From:** [Marshall, Amber](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)  
**Date:** Thursday, September 11, 2025 3:34:42 PM



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 Senior Vice President Risk Management Officer of Plumas Bank, a 2 billion dollar Community Bank headquartered in Quincy, Ca. 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.

Community banks like Plumas Bank play a unique and vital role in today's financial landscape. We fill service gaps that larger institutions often overlook, offering responsive lending, tailored financial solutions, and long-term relationships that grow alongside our clients. Our strength lies in understanding local markets and investing in the people behind them, from multi-generational farming operations to commercial real estate ventures that fuel job creation and economic vitality. We've been deep-rooted in our communities since 1980.

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:

- Business Email Compromise (BEC)
- Account Takeover
- Check Fraud via Mail Theft
- Synthetic Identity Fraud

- Phishing Scams
- Pig Butchering Investment Scams
- ACH & Wire Fraud via Compromised Accounts

Several actions can be taken to assist consumers, businesses, and financial institutions in mitigating payments fraud including the following:

**External Collaboration:** Local and regional collaboration across community banks, federal and state regulators, law enforcement agencies, community organizations, and other stakeholders can be an effective way to build connections and share information at the community level.

**Regulation and Supervision:** Payment fraud regulations and examiner expectations need to be appropriately tailored to community banks with tiered compliance requirements and deadlines. There's also opportunities to enhance supervisory guidance around appropriate controls, suitable technology, reporting, and incident response, but it's important to emphasize the need to avoid imposing new burdens on community banks.

Check fraud 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, especially in instances where the larger institution should bear the loss.

Changes to Regulation 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 (e.g., "altered" and "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.

**Payments Fraud Data Collection and Information Sharing:** While centralized data reporting would be valuable for the ecosystem, agencies should avoid imposing additional data collection requirements on community banks and implement safe harbors to increase the willingness to share fraud data.

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

Sincerely,

Amber Marshall



**AMBER MARSHALL**  
Senior Vice President, Risk Management Officer  
Risk Management

[REDACTED]

[REDACTED]