

From: [Alicia Crum](#)
To: [Comments](#)
Cc: [Howard Dee Smith](#)
Subject: [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date: Thursday, September 4, 2025 4:12:24 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 Executive Vice President-Cashier/Controller-Compliance Officer of Winnsboro State Bank and Trust Company, a \$392M community bank located in Winnsboro, Louisiana. 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.

Winnsboro State Bank (WSB) is a 123-year-old bank serving three parishes and proudly rooted in rural Louisiana. For more than a century, we have built lasting relationships by serving families, farmers, and small businesses with integrity and personal care. Our mission is centered on strengthening our communities by providing financial solutions that help local businesses grow, supporting families as they plan for the future, and contributing to the vitality of the towns we call home.

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:

- Elders in the community have been targeted due in combination to limited digital

literacy and the exploitation of their isolation and cognitive decline.

- Paper checks are still widely used in rural markets, leading to increased cases of stolen and altered checks.
- Fraudulent checks used to purchase goods and services at local businesses do not just affect the business, but also the individuals they employ.

I urge the OCC, FRS, and FDIC to consider the following issues:

- We worry that many of our neighbors—especially seniors, families, and small business owners in rural and farming communities—do not always get the information they need to protect themselves. Educational materials designed specifically for them would make a real difference. In many of these areas, reliable internet access is not widely available, so depending only on online resources leaves too many people without the support they need.
- We are worried about how common check fraud has become. It feels like some of the larger banks are not being careful enough when they open new accounts, and that gives fraudsters an easy way in. When these bad checks cross between banks, our local community banks are often left struggling to get the issue resolved, and that hurts both the banks and the people who depend on them.
- Community banks need automated tools for collecting, analyzing, and reporting data that work seamlessly with the systems they already use—and that do not add extra costs.

Thank you for the opportunity to provide comments on this RFI. We look 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,

Alicia Crum

EVP-Cashier/Controller-Compliance Officer

Winnsboro State Bank & Trust Company

Winnsboro, Louisiana

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