Legal Division

August 7, 2020

TO: Executive Secretary

FROM: C. Christopher Ledoux

Senior Special Counsel, Corporate Expert Financial Technology & Innovation Group

Legal Division

SUBJECT: Meeting with Fidelity National Information Services, Inc. (FIS) Related to the

FDIC's Request for Information (RFI) on Standard Setting and Voluntary Certification for Models and Third-Party Providers of Technology and Other

Services

Please include this memorandum in the public file on the Request for Information on Standard Setting and Voluntary Certification for Models and Third-Party Providers of Technology and Other Services (RIN 3064-ZA18), 85 Fed. Reg. 57927.

On August 6, 2020, FDIC staff (Leonard Chanin, Scott Christensen, Thomas Fox, Martin Henning, C. Chris Ledoux, Alexander LePore, Jr., and Brandon Milhorn) participated in a virtual meeting with representatives of FIS. Andrew Ciafardini, Sue Dillon, and Jonathan Genovese participated on behalf of FIS.

FIS is considering submitting a comment letter in response to the RFI and asked the FDIC to describe its objectives as set forth in its RFI. The discussion focused on the agency's consideration of standard setting and certification frameworks. FDIC staff explained that the RFI is intended to assist the agency in exploring the potential benefits such approaches could provide in addressing some of the challenges encountered by community banks when deploying new models and onboarding third-party technology providers. The FDIC is also interested in learning to what degree voluntarily meeting standards consistent with supervisory expectations and obtaining certifications could overcome impediments technology firms face in seeking to do business with community banks. FIS and the FDIC staff also discussed existing standard setting organizational models and forms of public-private partnerships, as well as the resources typically committed to such undertakings.