

## MEMORANDUM

**TO:** Executive Secretary

**RE:** Computer-Security Incident Notification Requirements for Banking Organizations and Their Bank Service Providers (RIN 3064–AF59)

**FROM:** Graham N. Rehrig, Senior Attorney, FDIC Legal Division

**DATE:** June 23, 2021

**SUBJECT:** Meeting with Representatives from the Financial Services Sector Coordinating Council

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On March 2, 2021, staff from the Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRB), and Federal Deposit Insurance Corporation (FDIC) held a virtual meeting with representatives from the Financial Services Sector Coordinating Council (FSSCC). The FSSCC representatives shared their views on a notice of proposed rulemaking published in the *Federal Register* by the OCC, FRB, and FDIC on January 12, 2021 (86 Fed. Reg. 2,299). FSSCC discussed the following aspects of the proposed rulemaking: (i) how information provided under the rule would be used or shared among the agencies or otherwise; (ii) the timeframe for notification; and (iii) service provider notification. A list of participants appears below.

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**FDIC** John Dorsey, Acting Supervisory Counsel, Legal Division  
Robert Drozdowski, Special Assistant to the Deputy Director, Division of Risk Management Supervision  
Martin Henning, Deputy Director, Division of Risk Management Supervision  
Graham Rehrig, Senior Attorney, Legal Division

**OCC** Kevin Greenfield, Deputy Comptroller for Operational Risk Policy  
Carl Kaminski, Special Counsel, Chief Counsel's Office  
Patrick Kelly, Director, Critical Infrastructure Policy  
Karee Payton, Policy Analyst, Critical Infrastructure Policy

**FRB** Norah Barger, Senior Advisor, Supervision and Regulation Division  
Don Peterson, Supervisory Cybersecurity Analyst, Supervision and Regulation Division  
Julia Philipp, Lead Financial Institution Cybersecurity Policy Analyst, Supervision and Regulation Division  
Jay Schwarz, Special Counsel, Legal Division  
Claudia Von Pervieux, Senior Counsel, Legal Division

American Bankers Association	Denyette DePierro, Vice President and Senior Counsel
American Express	Caitlin McCarthy Clarke, Director, Cyber Industry Partnerships Chris Merida, VP, Federal Government Affairs Khizar Sheikh, Attorney, Technology & Digital Law Group
Bank of America	Nicole Muryn Clement, SVP, GIS External Engagement Lelia Sloane, VP, GIS External Engagement
Bank Policy Institute	Brian Anderson, SVP, Technology Regulation Nicole Friedlander, Outside Council, Partner at Sullivan and Cromwell LLP Heather Hogsett, SVP, Technology & Risk Strategy
Cross River	Aaron Iovine, Head of Policy and Regulatory Affairs
Fannie Mae	Jennifer Mailander, Deputy General Counsel Data Privacy & Cybersecurity, Legal Department
JP Morgan Chase	Debbie Eng, Executive Director, Technology & Cybersecurity Policy and Partnerships
Morgan Stanley	James Alex, VP, Legal and Compliance Matthew Goard, Executive Director, Technology & Operations Risk
MUFG	Alejandro Mosquera, Director and Assistant General Counsel
Reliant Bank	David Baker, Chief Information Security Officer
Synchrony Financial	Ricky B. W. Davis, SVP, Chief Privacy Officer & IT Counsel
US Bank	Murray Kenyon, Cybersecurity Partnership Executive, Vice President, Information Security Services
USAA	Dirce E. Hernandez, Cybersecurity Compliance Risk Manager
Wells Fargo	Michelle McCoy, SVP Public Policy Engagement Kelly Wilkins, Senior Counsel, InfoSec legal team