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Sent: Thursday, July 15, 2021 1:36 PM
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Subject: [EXTERNAL MESSAGE] "Docket ID OCC-2021-0011" Docket No. OP-1752 "FDIC RIN
3064-ZA26

Dear Regulatory Agencies,

In reading over your guidance, I don't see an email address designated by the OCC as both the FDIC and Federal Reserve have given. Will these 3 email addresses suffice for comments or is it necessary to comment to the OCC as well?

Dear Trade Associations,

There is often a wide divergence from best case scenarios to real world contracts from our vendors. That is certainly the case in the contract negotiation language on pages 34-45 of the comment request. I have seen lots of vendor contracts, but I have yet to see one that will meet the standard outlined in this guidance. I don't think we will get there unless there is pressure from the regulators, but I would certainly hate to be held to this standard by our regulators as a small community bank with very little leverage negotiating with these third party vendors.

I urge you all to send this out to your members for comments.

Agencies Request Comment on Proposed Risk Management Guidance for Third-Party Relationships

<https://www.fdic.gov/news/press-releases/2021/pr21061.html>

<https://www.fdic.gov/news/press-releases/2021/pr21061a.pdf>

Thank you,



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