

**From:** Robert Rutowski [REDACTED]  
**Sent:** Thursday, September 24, 2020 2:55 PM  
**To:** Public Information; Comments  
**Cc:** Keith Abouchar  
**Subject:** [EXTERNAL MESSAGE] Avoid Industry-Led Standard Setting Organization

Jelena McWilliams, Chair  
Federal Deposit Insurance Corporation  
Public Information Center  
3501 North Fairfax Drive  
Room E-1021  
Arlington, VA 22226  
publicinfo@fdic.gov, comments@fdic.gov

Re: Avoid Industry-Led Standard Setting Organization

Dear Chair:

As the Federal Deposit Insurance Corporation (FDIC) reassesses third-party partnerships regarding financial technology (fintech), urge refrain from delegating its responsibilities to a public-private standard-setting organization (SSO) and instead develop its own expertise in the context of a robust, precautionary, approach to oversight. Facilitating compliance with SSO standards is not an acceptable means of regulation, nor an acceptable alternative to regulation.

Full comment letter:

<https://ourfinancialsecurity.org/wp-content/uploads/2020/09/AFR-Education-Fund-DPEF-Comment-FDIC-Docket-RIN-3064-ZA181.pdf>

The FDIC should not rush any fintech initiatives and to seek more public comment on these topics before moving forward.

Yours sincerely,  
Robert E. Rutkowski

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