

MEMORANDUM

TO: Executive Secretary

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

FROM: John Dorsey, Counsel, FDIC Legal Division

DATE: November 17, 2021

SUBJECT: Meeting with Representatives from Fiserv

On April 7, 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 Fiserv, Inc., and their representatives from the firm Rich Feuer Anderson (RFA). Fiserv and its 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). Fiserv and its representatives discussed the following aspects of the proposed rulemaking: the scope of the defined term “computer security incident” with regard to scheduled routine maintenance; reporting minor disruptions; and alignment with National Institute of Standards and Technology definitions. A list of participants appears below.

Fiserv/RFA:

1. Jared Sawyer, Rich Feuer Anderson LLC, Principal
2. Alex Teel, Rich Feuer Anderson LLC, Principal
3. Patrick Cuff - VP, Government Relations, Fiserv
4. Ryan Dobrusin - Senior Staff Counsel, Fiserv
5. Kimberly Ford - SVP, Government Relations, Fiserv
6. Ronald Smalley - SVP, Cyber Security Operations
7. Elizabeth Stangohr - VP, IT Service Support, Fiserv
8. Dawn Reinert - SVP, Associate General Counsel Data, Privacy, and Regulatory Affairs, Fiserv

FDIC:

1. Brandon Milhorn – Chief of Staff
2. Doreen Eberley – Director of Risk Management Supervision
3. Martin Henning – Associate Director for Operational Risk
4. Harrel Pettway – Senior Deputy Counsel
5. John Dorsey – Counsel
6. Rob Drozdowski – Special Assistant to the Deputy Director, Operational Risk

FRB:

1. Nida Davis – Associate Director, Systems and Operational Resilience Policy (SORP)
2. Norah Barger – Senior Advisor, Policy, Supervision & Regulation
3. Julia Philipp – Lead FI Cyber Policy Analyst, SORP
4. Jay Schwarz – Special Counsel, Legal Division
5. Don Peterson – Supervisory Cybersecurity Analyst, SORP
6. Claudia Von Pervieux – Senior Counsel
7. Kathy Wang – Counsel

OCC:

1. Kevin Greenfield – Deputy Comptroller for Operational Risk
2. Patrick Kelly – Director for Critical Infrastructure Policy
3. Carl Kaminski – Special Counsel
4. Priscilla Benner – Senior Attorney