

April 17, 2014

The Honorable Thomas J. Curry  
Comptroller of the Currency  
250 E Street SW  
Washington, DC 20219

Dear Comptroller Curry:

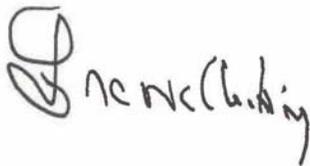
I read your recent speech to the CES Government and was dismayed to find that, rather than being a call-to-action for vendors to step-up their game to provide secure technologies, it was an uncalled-for criticism of the banking industry that has set the standard for cybersecurity preparedness. The sweeping generalizations are unfair to the thousands of community banks that have devoted considerable resources to protecting their customers' data. Indeed, I have already heard from bankers concerned that your comments will only raise their customers' anxiety when the industry has been working overtime in an effort to protect customer data and accounts.

Bankers share your goal of insuring all banks have the tools to resist cyber-attacks. Protecting customers has always been and will remain a top priority for every bank. Our industry, collectively, has a long history of stopping constantly evolving threats—whether they are physical, paper or electronic—through continuous collaboration with each other, law enforcement, regulators and vendors.

I agree that vendors play an extremely important role in our industry. I applaud you for taking the time to address them as a group and encourage you to continue to do so. To me, stressing *their* obligation to build and provide secure technologies—in partnership with banks—would have been a message that would have resonated. Unfortunately, I fear the result has been to inadvertently and inappropriately increase the reputational risk for an industry that has done more than any other to protect its customers.

Your efforts to speak to banks about the importance of cybersecurity are laudable. We need to be partners in helping all parts of the industry—including vendors that serve our banks—to better protect our customers.

Sincerely,



Frank Keating