



September 21, 2015

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Attention: 1557-0328
400 7th Street S.W., Suite 3E-218, Mail Stop 9W-11
Washington, DC 20219
praininfo@occ.treas.gov

RE: FFIEC Cybersecurity Assessment Tool; OMB Number 1557-0328

Dear Sir and Madam:

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing 270 state and nationally chartered banks, savings and loan associations, and savings banks located in communities throughout the state. WBA appreciates the opportunity to comment on the cybersecurity assessment tool recently posted by the Federal Financial Institutions Examination Council (FFIEC) to its website.

WBA and its members fully recognize the evolving and ever increasing risk posed to financial institutions by cyberattacks. We also recognize that such attacks may result in not only access to, and the compromise of, confidential information, but of the potential destruction of critical data and systems. To that end, financial institutions in Wisconsin have been diligent in their efforts to review, update, and protect against cyberattacks.

WBA appreciates the federal banking agencies' actions to create the assessment tool as it is helpful for institutions seeking such information; however, WBA wishes to remind the federal banking agencies, and their examiners, that the use of the tool ***is not mandatory***.

Many Wisconsin financial institutions have used other resources than what are found within the assessment tool and WBA believes those institutions should not be forced to spend hours justifying to examiners why alternative resources work for that particular institution. WBA fears the federal banking agencies, through their examination process, will force all financial institutions into one box and ultimately into using only those resources within the tool. WBA believes the federal banking agencies must remind examiners that the use of the assessment tool, while helpful, is not mandatory. Financial institutions must be able to use any and all resources available for monitoring, detecting, and preventing cyberattack as the institution believes fits its particular needs and risks.

WBA appreciates the opportunity to comment on the cybersecurity assessment tool.

Sincerely,

A handwritten signature in black ink, appearing to read "Rose Oswald Poels", written over a horizontal line.

Rose Oswald Poels
President/CEO