From:	Shelbi Duke
To:	PRAINFO
Subject:	Comment on FFIEC Cybersecurity Assessment Tool
Date:	Thursday, August 20, 2015 1:53:15 PM
Attachments:	image002.png Shelbi Duke.vcf

To Whom It May Concern,

This email is in response to the request for comment on the Federal Register site concerning the FFIEC Cybersecurity Assessment Tool.
https://www.federalregister.gov/articles/2015/07/22/2015-17907/agency-information-collection-activities-information-collection-renewal-comment-request-ffiec#addresses

Our institution has completed all the questions in the tool and we are evaluating the risk level outcomes. There is one area of the tool/questionnaire that we believe the risk and questions are not properly segregated/weighted. Refer to the Inherent Risk Profile section in the Delivery Channels category. Please note that there are only three questions for the category.

The first two questions we are categorized as moderate risk, as we offer online banking and consumer mobile banking.

Our issue lies with the third question regarding ATM’s. We own and manage two remotely located ATM's. The cash reload is conducted by bank staff under dual-control, and the ATM’s are balanced daily. We further own and manage one ATM located at the main bank drive-thru that is directly connected to the network. However, we do not provide ATM services to other financial institutions, nor do we have ATM's at any international location. We believe that the answer options should be segregated more to allow for small community banks, like us, who do not provide domestic ATM services to other institutions or have international ATM locations, to be more fairly risk weighted.

Risk Profile: Delivery Channels

Various delivery channels for products and services may pose a higher inherent risk depending on the nature of the specific product or service offered. Inherent risk increases as the variety and number of delivery channels increases. This category addresses whether products and services are available through online and mobile delivery channels and the extent of automated teller machine (ATM) operations.

- [ ] View Only Unanswered Questions

1. **Online presence (customer)**
   - ( ) No Web-facing applications or social media presence
   - ( ) Serves as an informational Web site or social media page (e.g., provides branch and ATM locations and marketing materials)
   - (•) Serves as a delivery channel for retail online banking; may communicate to customers through social media
   - ( ) Serves as a delivery channel for wholesale customers; may include retail account origination
   - ( ) Internet applications serve as a channel to wholesale customers to manage large value assets

   + Add Comments

2. **Mobile presence**
   - ( ) None
   - ( ) SMS text alerts or notices only; browser-based access
   - (•) Mobile banking application for retail customers (e.g., bill payment, mobile check capture, internal transfers only)
   - ( ) Mobile banking application includes external transfers (e.g., for corporate clients, recurring external transactions)
   - ( ) Full functionality, including originating new transactions (e.g., ACH, wire)

   + Add Comments

3. **Automated Teller Machines (ATM) (Operation)**
   - ( ) No ATM services
   - ( ) ATM services offered but no owned machines
   - ( ) ATM services managed by a third party; ATMs at local and regional branches; cash reload services outsourced
   - ( ) ATM services managed internally; ATMs at U.S. branches and retail locations; cash reload services outsourced
   - (•) ATM services managed internally; ATM services provided to other financial institutions; ATMs at domestic and international branches and retail locations; cash reload services managed internally

Thanks,

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