



**VIA EMAIL**

January 14, 2016

Legislative and Regulatory Activities Division  
Office of the Comptroller of the Currency  
Attention: 1557-0328  
400 7<sup>th</sup> Street SW., Suite 3E-218, Mail Stop 9W-11  
Washington, DC 20219  
[prainfo@occ.treas.gov](mailto:prainfo@occ.treas.gov)

**RE: Renewal of FFIEC Cybersecurity Assessment Tool Information Collection; 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 renewal of Federal Financial Institutions Examination Council's (FFIEC's) cybersecurity assessment tool information collection (Assessment).

WBA appreciates the actions taken by the federal banking agencies in response to comments received regarding the July 22, 2015, information collection notice (80 FR 4355). More specifically, WBA appreciates that the federal banking agencies will: (1) consider developing an FAQ document to address questions and requests for clarifications that the agencies have received since the publication of the Assessment; (2) develop a process to update the Assessment on a periodic basis; (3) refine their burden estimates to be based on financial institution asset size; and (4) further educate examiners on the voluntary nature of the Assessment—including statements about its voluntary nature in examiner training materials.

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, and will continue to be, diligent in their efforts to review, update, and protect against cyberattacks.

Again, WBA appreciates the actions taken by the federal banking agencies regarding the Assessment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rose Oswald Poels", written in a cursive style.

Rose Oswald Poels  
President/CEO