

Tuesday, June 4, 2019

Chief Counsel's Office
Office of the Comptroller of the Currency
400 7th Street SW
Suite 3E-218,
Washington, DC 20219

Re: *Agency Information Collection Activities: Information Collection Renewal; Comment Request; FFIEC Cybersecurity Assessment Tool*
84 Fed. Reg 13786 (proposed April 4, 2019)
OCC 1557-0328

Submitted electronically to prainfo@occ.treas.gov

Dear Sir or Madam:

The American Bankers Association (ABA) appreciates the opportunity to write in support of the letter submitted by the Financial Services Sector Coordinating Council (FSSCC) in response to April 4, 2019 Paperwork Reduction Act (PRA) notice and request for comment. The PRA, filed by the Office of the Comptroller of the Currency (OCC) on behalf of the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the National Credit Union Administration, invites comment on the renewal of the information collection authored by the Federal Financial Institutions Examination Council (FFIEC), entitled the FFIEC Cybersecurity Assessment Tool (CAT).

The ABA strongly supports the work of FSSCC on behalf of the financial services sector and endorses the comments and recommendations made in the FSSCC PRA letter as well as the prior FSSCC PRA responses filed in September 2015 and January 2016, incorporated by reference in June 2019 FSSCC letter and included in Appendix A and Appendix B, respectively.

In support of the FSSCC letter, we offer further details and a summary of the ABA cybersecurity survey mentioned in Section I, *FSSCC Supports Voluntary Use of the FFIEC CAT* of June 2019 FSSCC letter.

Methodology and Results of 2018 ABA Survey of CAT Use and Voluntariness.

The 2018 *Survey of Cyber and Information Security Examination Trends* was produced by ABA's in-house Benchmarking Group. Over 6 weeks of outreach through ABA working groups, affiliated state banking associations, social media networks, Financial Services Information Sharing and Analysis Center (FS-ISAC), and FSSCC members, 122 FDIC-insured financial institutions responded to 3 questions regarding their use, perceptions, and experience with CAT. Of the 122 banks, 59% had the FDIC as their primary federal regulator and 88% were under \$10B in assets. Of those, 61% were under \$1B in assets. The survey responses regarding use and examination experience were consistent across institutions, notwithstanding their primary federal supervisor or asset size.

Among the notable responses:

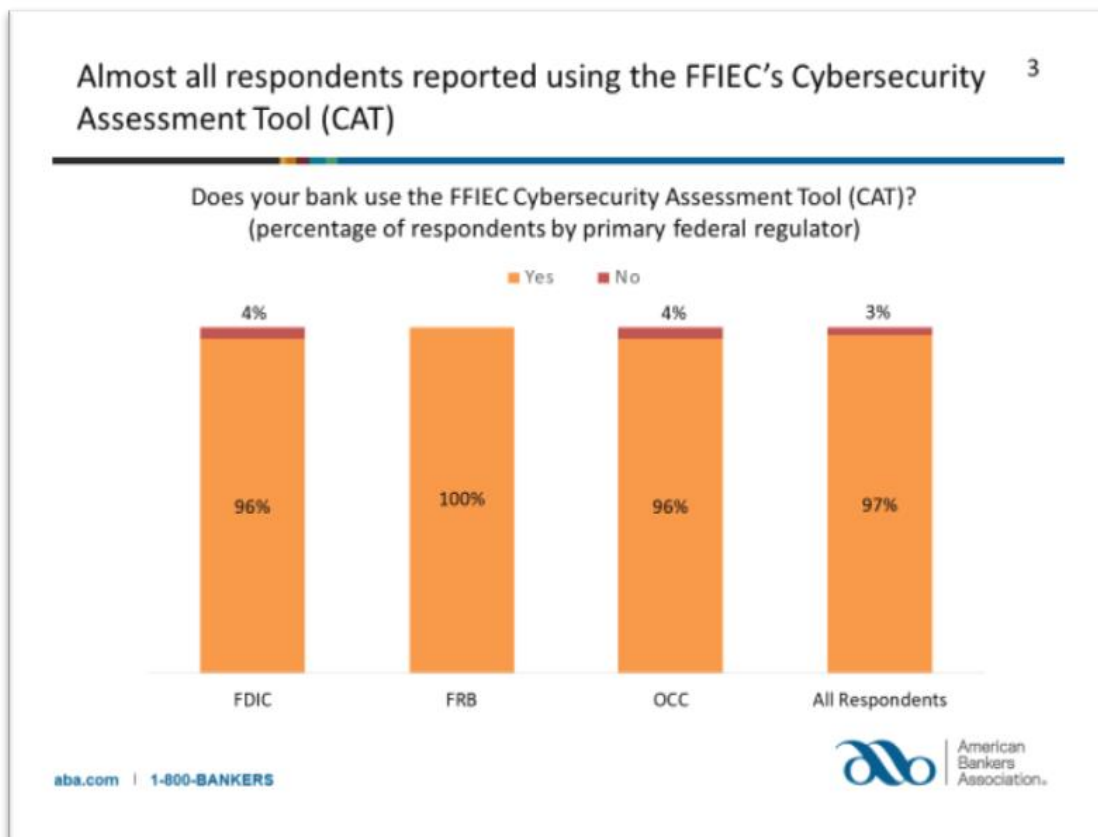
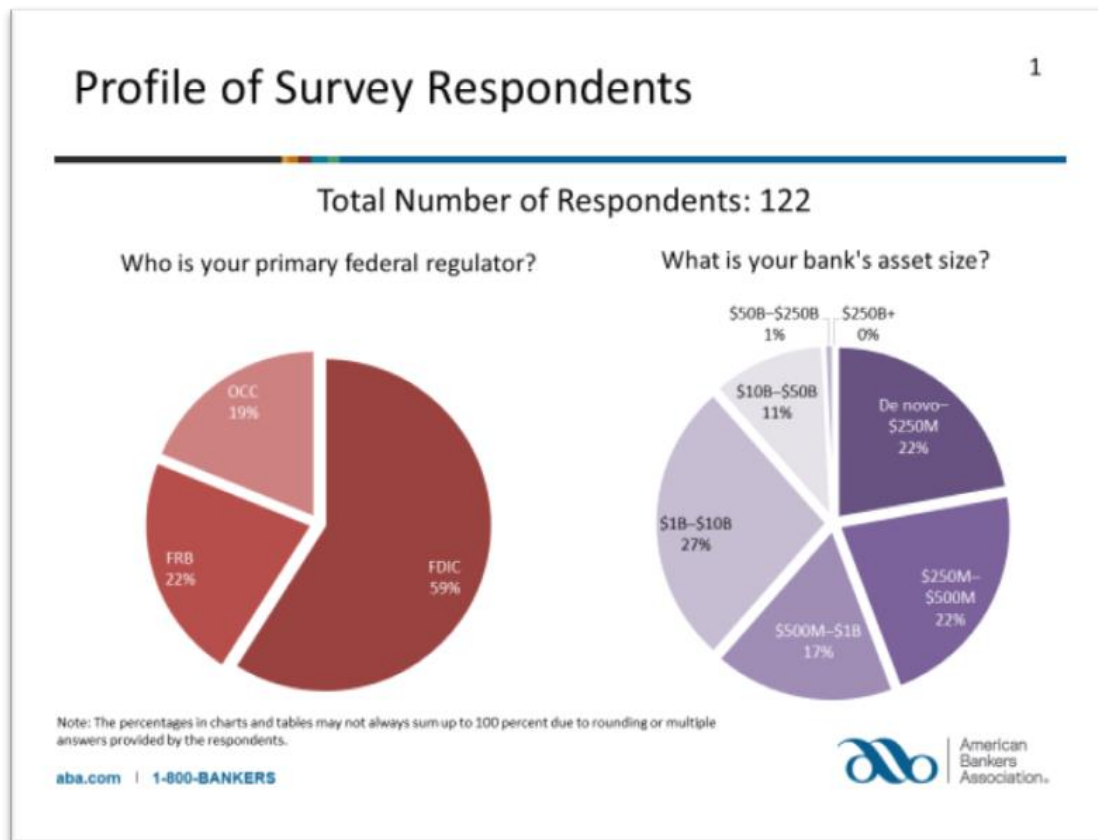
- Almost all respondents reported using the CAT;
- 85% of the respondents were asked to provide CAT findings or results during their most recent IT examination;
- Only 16% of the respondents thought use of the CAT is voluntary; and
- 74% believed use of CAT was not voluntary.

For your further study and review, a graphic summary of the pool of respondents and the survey results broken out by primary federal supervisor is attached to this letter as Appendix A.

We appreciate the opportunity to respond to the PRA request for comment and to submit in support of June 2019 FSSCC letter further details of the 2018 ABA survey of CAT examination trends. Questions about the 2018 ABA survey may be directed to ABA's Denyette DePierro at ddepierr@aba.com or 202-663-5333.

Sincerely,

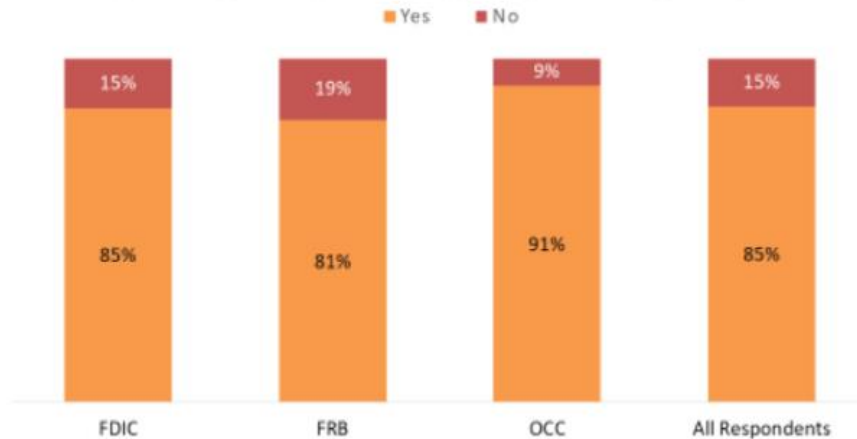
AMERICAN BANKERS ASSOCIATION



85% of the respondents were asked to provide their CAT findings during their most recent IT/cyber exam

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Were you asked to provide your CAT findings (or results) during your most recent IT/cyber exam?
(percentage of respondents by primary federal regulator)



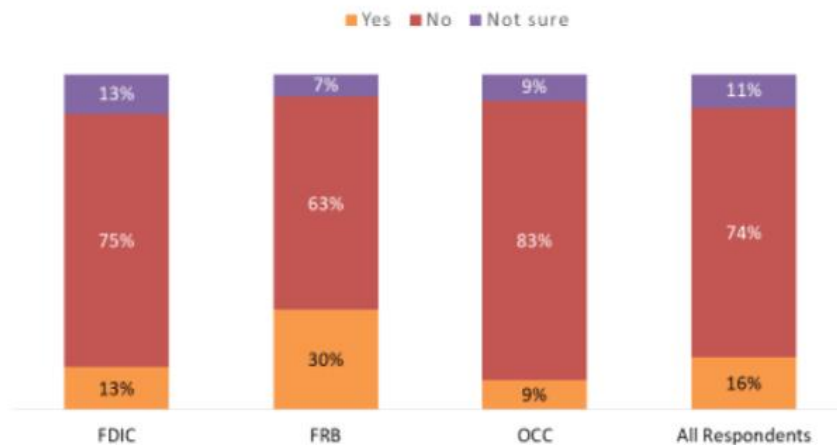
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Only 16% of the respondents thought use of the CAT is "voluntary"

5

In your opinion, is use of the CAT voluntary?
(percentage of respondents by primary federal regulator)



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