

August 20, 2021

Via eRulemaking Portal

Ann Misback
Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

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

James P. Sheesley
Assistant Executive Secretary
Attention: Comments RIN 3064-ZA26,
Legal ESS
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Requesting Extension for Comment Period Regarding the Proposed Interagency Guidance on Third-Party Relationships – Fed Docket No. OP-1752; FDIC RIN 3064-ZA26; Docket ID OCC-2021-0011

To Whom It May Concern:

On behalf of the Electronic Transactions Association (“ETA¹”), we respectfully request that the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (the “Agencies”) extend the comment period on the Proposed Interagency Guidance on Third-Party Relationships by 30 days, to October 18, 2021, to give our member companies adequate time to provide meaningful feedback on the Proposed Guidance.

Third-party relationships play an important role in many functions of ETA’s member companies and will be of significant interest to a wide range of functions and disciplines within those companies — from risk management to cybersecurity to technology deployment. Because a large number of ETA companies are likely to contribute their perspectives on this issue and the growing importance of third-party relationships, we believe the Agencies should extend the 60-day comment period by an additional 30 days.

¹ ETA is the world’s leading advocacy and trade association for the payments industry. Our members span the breadth of significant payments and fintech companies, from the largest incumbent players to the emerging disruptors in the U.S and in more than a dozen countries around the world. ETA members make commerce possible by processing more than \$21 trillion in purchases worldwide and deploying payments innovation to merchants and consumers.

Additionally, as the Agencies likely know, September is filled with numerous religious holidays (observed on September 7-8, 16, 21-22, and 28-29), which will make it difficult for some ETA members to meet the comment period deadline.

ETA believes the current 60-day comment period does not provide adequate time to thoroughly analyze the implications of the Proposed Guidance and, therefore, we respectfully request that the Agencies extend the deadline for comments for at least an additional 30 days to provide our members adequate time to develop thorough and informed comments.

* * *

Thank you for your consideration of this request. If you have any questions, please contact me or ETA's Senior Vice President of Government Affairs, Scott Talbott, at stalbott@electran.org.

Sincerely,



Jeff Patchen
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Electronic Transactions Association
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