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August 11, 2000

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Welsh and Norristown Roads
P.O. Box 3030
Maple Glen, PA 19002-8030
215-646-4505
FAX 215-643-9413

Manager, Dissemination Branch
Information Management and Services Division
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Warminster
1555 West Street Road
Warminster, PA 18974-3103
215-674-4260
FAX 215-674-5192

re: Docket No. 2000-51

1141 Ivyland Road
Warminster, PA 18974-2048
215-956-9390
FAX 215-956-9693

This letter is a comment on the proposed "Interagency guidelines establishing standards for safeguarding customer information and rescission of year 2000 standards for safety and soundness."

Willow Grove
9 Easton Road
Willow Grove, PA 19090-0905
215-659-6600
FAX 215-659-0265

Part II – Standards for Safeguarding Customer Information

B-2 Objectives - Ensure the security and confidentiality of customer information

Dresher
701 Twining Road
Dresher, PA 19025-1894
215-885-7400
FAX 215-885-4951

Comment - The word "ensure" means to guarantee. I don't think this is an appropriate phrase. Banks must continually evaluate risks and place appropriate controls in place to mitigate those risks. The level of controls necessary to "ensure" confidentiality of customer information would be burdensome, especially in the area of computer operations. Even government facilities have been breached by hackers. The word "ensure" is not a reasonable standard to set. I don't recall the word "ensure" included in any other regulation. The adoption of this phrase would be placing higher standards on banks than we have ever had.

Huntingdon Valley
761 Huntingdon Pike
Huntingdon Valley, PA 19006-8399
215-379-5386
FAX 215-379-0755

Part III – Development and Implementation of Information Security Program

A-2-C Board reporting provision

Hatboro
2 N. York Road
Hatboro, PA 19040-3201
215-328-9570
FAX 215-328-9574

Comment - I favor setting a specific timeframe for reporting to the board. My preference would be for an annual presentation.

Roslyn Valley
1331 Easton Road
Roslyn, PA 19001-2426
215-481-9250
FAX 215-481-9255

Somerton
11730 Bustleton Avenue
Philadelphia, PA 19116-2543
215-698-7499
FAX 215-698-7435

North Wales
122 N. Main Street
North Wales, PA 19454-3115
215-699-8085
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Rhawnhurst
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Philadelphia, PA 19152-2719
215-725-7805
FAX 215-725-4829

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DISSEMINATION

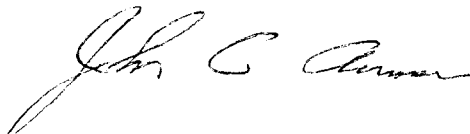
C-1 – Written Policies and Procedures (Items a-k)

Item f – Dual control procedures, segregation of duties, and employee background checks for employees with responsibilities for or access to customer information.

Comment - Traditionally, dual control procedures are instituted when dealing with cash or negotiable items. Instituting dual control procedures for just the act of accessing customer information would be, at a minimum, burdensome, or at most, impossible. After employee screening and proper training we must let individual employees perform their duties.

I thank you for considering my comments when evaluating these proposed guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Auman". The signature is fluid and cursive, with the first name "John" being the most prominent.

John C. Auman
Director of Internal Audit/Compliance
Phone (215) 643-5696 ext. 3218

08/11/00 jca/mb

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