



RESCINDED

Office of Thrift Supervision
Department of the Treasury

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Any attachments to this document are rescinded only as they relate to national banks and federal savings associations.

May 21, 2004

MEMORANDUM FOR: CHIEF EXECUTIVE OFFICERS

FROM:

Richard M. Riccobono *Richard M. Riccobono*

SUBJECT:

OTS Electronic Initiatives

The Office of Thrift Supervision strives to provide timely and efficient technological assistance and solutions to our examiners and the industry to meet our regulatory responsibilities and enhance our communication channels. The OTS tools described below leverage the availability and transferability of electronic based information between OTS and the institutions we regulate.

OTS Internet Site

OTS continues to utilize our public Internet site to disseminate official guidance and publications in a timely manner. The site includes a free service that provides subscribers with an e-mail alert when new material is posted to our public Internet site. To subscribe to this service, go to <http://www.ots.treas.gov/subscription>.

As a result of this free Web site e-mail subscription service, OTS will discontinue hard copy mailings of information included on our public Internet site (for example, CEO letters, Thrift Bulletins, and Regulatory Bulletins). If you would like to receive the Web site bulletins and handbooks on a compact disk (CD) each quarter, you may purchase an annual subscription to the OTS Publications CD for \$180. A courtesy copy of the Publications CD is included with this letter.

Secure Broadband Access

We have installed virtual private network software on the examiners' notebook computers to enable them to securely access OTS Systems and data over high-speed, broadband connections from your institution or other locations. OTS examiners have received training on appropriate use of thrift-provided Internet access for conducting examinations, and we have equipped the notebook computers with robust anti-virus and personal firewall software to ensure proper security and protection. As we expand the use of electronic information, we envision greater opportunities to use high-speed access from your institution or remote locations to reduce the burden on your staff and facilities.

OTS Secure Messaging Center

In late May, OTS will implement a service to enable the exchange of encrypted messages and documents directly with you and your designated staff. The OTS Secure Messaging Center service meets the industry standards for secure electronic data exchange and will facilitate the timely transmission of sensitive data and information. An easy-to-follow user manual and procedures will be provided when we activate the service. OTS staff will authenticate recipients on your staff before initiating secure messaging.

PERK and Other Electronic Documents

We recently converted the Preliminary Examination Response Kit (PERK) documents to electronic forms that may be completed by your staff and returned electronically for the OTS examiners to use in performing your examination. The forms may be provided to OTS through Secure Messaging or on a CD. Your staff should keep a copy of each file provided to the examination staff.

Important Note: Institutions will generally provide electronic files to OTS in two basic formats: (1) native format files (e.g., Microsoft Word, Excel, etc.) for use by OTS examiners and (2) if needed to represent your official responses, password protected Portable Document Format (PDF) files that cannot be altered by OTS staff.

The native format files will become examiner work papers, and the examiners may add comments or data to the files to complete their analyses. The locked PDF files cannot be altered by OTS staff and will be stored as “electronic records” submitted by the institution. We have included general guidance below for providing locked PDF files and encourage you to work with your OTS regional office contacts as we move forward in this area.

For any “electronic record” submitted by OTS-regulated entities or external business partners, the file provider should ensure that:

- The PDF file represents an acceptable duplicate of the original document;
- The PDF file has been password protected (locked) to prohibit modifications after its receipt by OTS;
- Full text searching and printing of the document are permitted; and
- The visual reproduction of all text has been guaranteed by imbedding all fonts when converting a file from native electronic format.

If you would like additional information or have any comments or questions on the tools and services described above, please feel free to call your OTS regional office contact.