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January 19, 2018

Ms. Judith E. Dupre
Executive Secretary
Federal Financial Institutions Examination Council
L. William Seidman Center
Mail Stop: B-7081a
3501 Fairfax Drive
Arlington, VA 22226-3550

Dear Ms. Dupre:

I am writing to ask the Federal Financial Institutions Examination Council to update its standards and require the use of multi-factor authentication in consumer banking transactions to better protect consumers from internet-based banking fraud.

As a formal interagency body with the power to create uniform standards for financial institutions, the Federal Financial Institutions Examination Council (FFIEC) has tremendous power to protect consumers from threats to their bank accounts, lines of credit, and other investments. The FFIEC has been a leader in this area, issuing guidance to the financial community in 2005 and 2011 on how best to protect against internet-based banking fraud.

The FFIEC's 2011 supplemental report for Internet banking authentication provided a strong baseline for protecting consumers. It strongly recommends multi-factor authentication, including device authentication, and provides useful criteria for institutions to consider as they develop customer fraud protection. However, since 2011 the nature of threats to financial institutions and consumers has evolved significantly. We now know that cyber criminals and governments have the ability to circumvent basic authentication mechanisms in order to access bank accounts and other sensitive information. New security requirements must account for this enhanced hostile threat environment: requiring multi-factor authentication is a common-sense step towards this goal.

Given the seriousness of the cyber threats now faced by financial institutions and their customers, the FFIEC should update its guidance to institutions to better protect against internet-enabled banking fraud. Specifically, the FFIEC should require financial institutions to utilize multi-factor authentication for consumer bank accounts, and require institutions to provide opt-in

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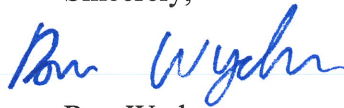
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support for more advanced, phishing-resistant forms of multi-factor authentication, such as a Universal Second Factor token.

Thank you for your attention to this issue. If you have any further questions about this request, please contact Chris Soghoian in my office at (202) 224-5244.

Sincerely,



Ron Wyden
United States Senator