

THE FINANCIAL SERVICES ROUNDTABLE



BITS

FINANCIAL SERVICES
R O U N D T A B L E

May 9, 2008

Ms. Valerie Abend
Deputy Assistant Secretary for Critical Infrastructure Protection and Regulatory
Compliance Policy
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Mr. Alfred R. Berkeley
National Infrastructure Advisory Council
In care of Pipeline Trading Services
60 East 42nd Street, Suite 624
New York, New York 10165

Mr. Michael J. Wallace
Chairman
Critical Infrastructure Partnership Strategic Assessment Study Group
National Infrastructure Advisory Council
In care of Constellation Energy
750 E. Pratt Street
Baltimore, Maryland 21202

Secretary Abend, Mr. Berkeley and Chairman Wallace:

The Financial Services Roundtable recognizes the importance of effective collaboration between our industry and federal authorities on critical infrastructure protection. Through its operations and technology division, BITS, the Roundtable has made a substantial commitment over many years to help build and maintain this partnership, and many of our member institutions have made direct contributions over the years. We strongly support your continuing work in this area, and appreciate your efforts to examine and improve the partnership mechanisms. As you examine the existing mechanisms and develop proposals for expanding or restructuring them, we urge you to consider the following views, distilled from discussions among our member organizations.

Three Connections

We value the Financial Services Sector Coordinating Council (“FSSCC”) primarily for its role in strengthening three types of connections: within our industry, with federal authorities, and with other critical sectors. While there are other means of communication across each of these dimensions, we rely heavily on the FSSCC to serve this function, and our comments are largely intended to strengthen this facilitation role.

Connections within Financial Services

The FSSCC and its communications utility, the Financial Services Information Sharing and Analysis Center, serve a central role in establishing and addressing our industry’s priorities in critical infrastructure protection. We believe that the current initiatives to expand the FSSCC membership to financial institutions and to create a permanent, dues-funded staff will strengthen this capacity. We support the work of the Research & Development Committee and are pleased to have recently assumed the Chair. We also support the creation of the Cyber-Security Committee and look forward to serving on the Steering Committee. As the Cyber-Security Committee scopes its work, we expect and would support a focus on infrastructure-level concerns, not on the transaction-level and account-level security issues that our institutions address locally on a daily basis.

Connection with Federal Authorities

We value the FSSCC’s connection with the Federal and Banking Information Infrastructure Committee (“FBIIC”), the Department of Homeland Security and other federal authorities. We believe, however, that the independence of the FSSCC is critical to its success, and we would oppose any proposal to relinquish that independence and integrate our Sector Specific Council completely into a federal agency. We particularly appreciate the opportunity that the FSSCC and FBIIC offer for us to work with regulatory agencies outside of their supervisory mode. As you consider changes to the current structure, in concert with the Treasury’s *Blueprint for a Modernized Financial Regulatory Structure* or separately, we urge you to preserve and expand this constructive, non-supervisory communication channel.

Connection with Other Sectors

We are very conscious of our interdependencies with other sectors – particularly telecommunications, information technology, electrical power and transportation – and we look to the Partnership for Critical Infrastructure Security and the National Infrastructure Advisory Council to help address these interdependencies. While significant strides have been made in this area, we believe that much remains to be done to give us the insights and the assurances we require from these other sectors.

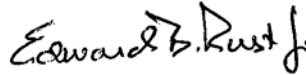
In summary, BITS, the full Roundtable, and our member institutions will continue to actively support the FSSCC and its objective of public/private sector collaboration on critical infrastructure protection. As the current proposals are adopted and new ones are developed, we urge you to protect and strengthen the connections across all three dimensions – within financial services, with the federal authorities and with other sectors – and to avoid changes that might compromise any of these linkages.

Thank you for your work on this topic and for your consideration of our input. We look forward to continued cooperation in this important area.

Sincerely,



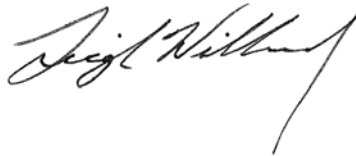
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