

OCC Innovation Pilot Program Comments

Submitted by Sunrise Banks, N.A. | St. Paul, Minnesota

1. As a supplement to existing agency processes, will the program provide additional value?

Yes. Sunrise Banks is happy with the OCC's proposed Innovation Pilot Program, and applauds the Office's aim to help eligible entities receive feedback on new products and services.

This program would be a welcome tool for banks looking to partner with financial technology companies (Fintechs) as well as a sought-after resource for Fintechs themselves. The OCC's proposal shows that the Office recognizes the ways in which the financial sector is changing, while also realizing the evolving roles of banks and financial institutions in today's technology-driven landscape.

The Pilot Program would be a boon to all financial institutions; however, it would be of perhaps greater importance to a community bank like Sunrise. Smaller banks often lack the resources of larger institutions and would happily invite input from the OCC regarding new products or services.

2. Are the eligibility criteria and evaluation process appropriate for an effective program? Why or why not?

Yes. We feel the eligibility criteria is sufficiently wide-reaching, and broad enough to deal with a number of different products or services. We are also happy with the proposed program's promotion of financial inclusion, fair access and fair treatment of consumers and small businesses.

3. Are the general program parameters appropriate? Why or why not?

Yes. We feel that the program length, tools, controls and safeguards are all satisfactory. The program parameters also seem to be reasonably malleable depending on a project's scope or size.

4. What may be the preferred nature of regulatory engagement through this program?

Ideally, the OCC would review product documents and meet with participants for a kick-off meeting during the initial stages of the program before holding quarterly meetings with the participant. Additional meetings should be held as necessary at the request of either the participant or the OCC.

5. What type of innovative activities would be best served through this program?

We believe this program could best serve innovations in the financial technology space. By giving Fintechs and banks the chance to receive feedback on upcoming or prospective projects, both parties will be able to gauge whether or not a product is ready for market, and whether or not it will serve its desired function.

The program would be particularly effective given some of the regulatory question marks that Fintechs and new technology in the industry pose.

6. Are there other suggestions or feedback as to how the program should work?

No.