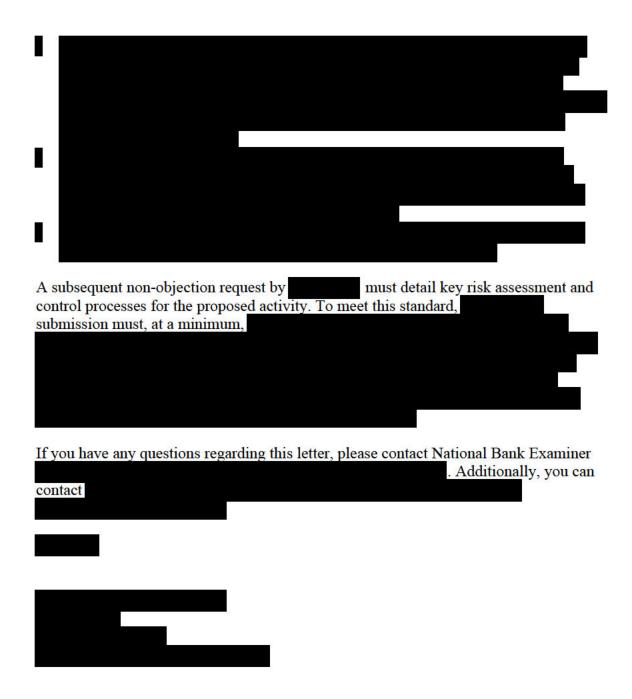
October 17, 2022

October 17, 2022
Subject: OCC Response to Request for Supervisory Non-Objection
Dear Mr.
This letter communicates the Office of the Comptroller of the Currency (OCC) response to correspondence submitted by on September 7, 2022, requesting the OCC's non-objection pursuant to OCC Interpretive Letter 1179, dated November 18, 2021, and interpretation of the proposed end of vendor product to OCC Interpretive Letter 1174. In that correspondence, requested supervisory non-objection to facilitate real, or near real-time, payments (RTPay) between customers through vendor platform. The proposed vendor product uses a blockchain technology and tokenized payments to support internal bank transfers. After consulting with the OCC's Chief Counsel's Office, we confirm the proposed activity is covered under OCC Interpretive Letter 1174.
Based on our review of the bank's risk assessment dated diligence information provided by has not demonstrated sufficient documentation or analysis of the proposed activities for us to make a determination on the issuance of an OCC non-objection. Additional information and analysis are required to address the following .



Confidentiality Statement

This document is CONTROLLED UNCLASSIFED INFORMATION (CUI). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with 32 CFR 2002, "Controlled Unclassified Information." This information must not be distributed beyond the original addressee(s) without prior authorization of the originator. For more information, visit the National Archives and Records Administration's CUI web page at www.archives.gov/cui. Unauthorized disclosure of the contents of this report, including component and composite ratings, is generally prohibited. Exceptions to the general prohibition on disclosure are described in OCC regulations, 12 CFR 4.37(b)(2). Any other disclosure of this document or its contents without the OCC's prior approval is a violation of 12 CFR 4.37(b) and subject to criminal penalties in 18 USC 641 for conversion of U.S. Government property.