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Secretariat of the Basel Committee on Banking Supervision Bank for International Settlements CH-4002 Basel, Switzerland

RE: Public Comment on Consultative Document: Consolidated guidelines and sound practices

To the Secretariat of the Basel Committee:

Thank you for the opportunity to provide feedback on the February 2026 Consultative Document, *Consolidated guidelines and sound practices*. As a fractional compliance officer advising financial institutions across the U.S. and Latin American markets, I strongly support the Committee's initiative to modernize, reorganize, and streamline its existing guidance into a searchable, modular framework.

Please find my comments regarding the specific consultation questions below.

Effectiveness of Removing Outdated Materials (Question 1) I commend the Committee for undertaking a rigorous review process and achieving a substantial 75% reduction in the volume of guidance materials. The removal of redundant post-crisis transition guidance and the clear categorization outlined in Annex 2 greatly improve the navigability of the BCBS framework.

However, the framework could go slightly further in removing functionally outdated materials. While the consolidation effectively clears out superseded documents, some materials retained as "Core material" may no longer align with current industry realities due to rapid technological evolution. Specifically, the inclusion of the 2003 guidelines on *Management and supervision of cross-border electronic banking activities* and *Risk management principles for electronic banking* within Module RMA50 (Digitalization and financial technology risks) introduces legacy assumptions into the new framework. Given the profound advancements in open banking, cloud computing, and cyber risk landscapes over the last two decades, I propose the Committee consider fully superseding these older technological guidelines and relying entirely on the Committee's more recent publications, such as the 2018 Fintech and Cyber-resilience guidance.

Clarity, Readability, and Policy Expectations (Question 2) The proposed framework overwhelmingly succeeds in improving clarity and accessibility. The transition from scattered, standalone PDF documents to a centralized, 13-module digital format is a highly welcome modernization for risk and compliance professionals. Embedding direct links to related standards, source documents, and relevant publications within each chapter provides a much-needed cohesive view of supervisory expectations.

Furthermore, the redrafting process appears to have successfully avoided introducing new policy expectations. Treating this initial iteration strictly as a "historical compilation" is the correct approach. However, because the volume of text was reduced so significantly, I encourage the Committee to establish a clear mechanism for stakeholders to flag any instances where the heavy streamlining of texts may have inadvertently altered the nuance or original intent of a standard during the implementation phase.

Areas for Substantive Review (Question 3) Building upon my observations regarding Question 1, I strongly recommend that the Committee prioritize a substantive review of **Module RMA50 (Digitalization and financial technology risks)**.

Relying on legacy guidelines alongside 2018 publications creates a gap in addressing today's most pressing technological risks. Further guidance is urgently warranted regarding the use of Artificial Intelligence (AI) and Machine Learning (ML) in banking operations and risk management. The rapid proliferation of Generative AI necessitates a formalized set of sound practices regarding model risk, data governance, and ethical AI deployment. Additionally, as banks increasingly rely on a small number of dominant tech firms for critical infrastructure, further substantive guidance on cloud concentration risk within Module ORR30 (Third-party risk management) would be highly beneficial to ensure global operational resilience.

Thank you for considering this feedback and for your ongoing work to strengthen global supervisory practices.

Sincerely,

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