

FEDERAL RESERVE BANK OF DALLAS

DALLAS, TEXAS 75222

Circular No. 68-238
November 8, 1968

REGULATION P

MINIMUM SECURITY DEVICES AND PROCEDURES FOR FEDERAL RESERVE BANKS AND STATE MEMBER BANKS

To All State Member Banks
in the Eleventh Federal Reserve District:

The Board of Governors of the Federal Reserve System has issued for public comment a proposed new regulation to implement the Bank Protection Act of 1968 (Public Law 90-389), which was signed into law on July 7 of this year. The Federal Deposit Insurance Corporation, the Comptroller of the Currency, and the Federal Home Loan Bank Board are issuing similar regulations applicable to insured nonmember banks, national banks, and savings and loan associations.

The purposes of each regulation are: (1) to establish minimum standards with which all affected institutions--banks and savings and loan associations--must comply with respect to the installation, maintenance, and operation of security devices and procedures; (2) to establish time limits within which each institution must comply; and (3) to require the submission of reports with respect to the installation, maintenance, and operation of security devices and procedures.

Enclosed is the text of the regulation proposed by the Board of Governors to be applicable to the State-chartered banks that are members of the Federal Reserve System. Also enclosed is a copy of an agency press announcement which describes some of the more important features of the regulations.

A draft of the proposed regulation is being published in the Federal Register with a request for public comments within 30 days from the date of publication. In order to conform to this timing, we would like to have your views and comments by December 6, 1968.

Yours very truly,

P. E. Coldwell

President

Enclosures (2)



FEDERAL RESERVE

press release

For release in morning papers of
Friday, November 8.

November 6, 1968.

The three Federal banking agencies and the Federal Home Loan Bank Board each issued today for public comment proposed regulations implementing the Bank Protection Act of 1968. After consideration of these comments the agencies plan to publish final regulations by January 6, 1969, as required by Public Law 90-389, which was signed by President Johnson on July 7, 1968.

The four regulatory authorities--the Federal Reserve Board, the Federal Deposit Insurance Corporation, the Comptroller of the Currency, and the Federal Home Loan Bank Board--consulted with each other extensively in formulating their drafts. The purposes of each regulation are:

(1) to establish minimum standards with which all affected institutions--banks and savings and loan associations--must comply with respect to the installation, maintenance, and operation of security devices and procedures to discourage robberies, burglaries, and larcenies and to assist in the identification and apprehension of persons who commit such acts;

(2) to establish time limits within which each institution must comply; and

(3) to require the submission of reports with respect to the installation, maintenance, and operation of security devices and procedures.

The staffs of the four agencies received advice from law enforcement officers, banks, equipment manufacturers, and trade associations. The proposed regulations differ with each other in some details, but each requires affected institutions:

(a) to designate a security officer;

(b) to develop a written security program spelling out in detail the security procedures for each office of the institution;

(c) to install lights, door locks, surveillance systems, and robbery and burglary alarms; and

(d) to submit an annual certification of compliance with the regulations, and report whenever a robbery, burglary, or larceny is attempted.

Attached is the text of the regulations proposed by the Board to be applicable to State-chartered banks that are members of the Federal Reserve System.

These banks and other interested persons have 30 days from publication in the Federal Register to submit comments to their District Federal Reserve Banks.

FEDERAL RESERVE SYSTEM

12 CFR Part 216

Regulation P

MINIMUM SECURITY DEVICES AND PROCEDURES
FOR FEDERAL RESERVE BANKS AND STATE MEMBER BANKS

Notice of Proposed Rule Making

Notice is hereby given that the Board of Governors of the Federal Reserve System, pursuant to the authority conferred by section 3 of the Bank Protection Act of 1968 (32 Stat. 295), is considering the addition of a new Part 216, entitled "Minimum Security Devices and Procedures for Federal Reserve Banks and State Member Banks", to Title 12 of the Code of Federal Regulations.

The proposed new Part 216 would (1) establish minimum standards with which each Federal Reserve Bank and each State member bank must comply with respect to the installation, maintenance, and operation of security devices and procedures to discourage robberies, burglaries, and larcenies and to assist in the identification and apprehension of persons who commit such acts; (2) establish time limits within which Federal Reserve Banks and State member banks shall comply with such standards; and (3) require the submission of reports with respect to compliance.

This notice is published pursuant to section 553 of title 5, United States Code, and section 262.2(a) of the rules of procedure of the Board of Governors of the Federal Reserve System.

To aid in the consideration of this matter by the Board, interested persons are invited to submit relevant data, views, or arguments. Any such comments or material should be submitted in writing to any Federal Reserve Bank or to the Secretary, Board of Governors of the Federal Reserve System, Washington, D. C. 20551, to be received not later than 30 days from the date of publication of this notice in the FEDERAL REGISTER.

Dated at Washington, D. C., this day of November, 1968.

By order of the Board of Governors.

/Seal/

Robert P. Forrestal,
Assistant Secretary.

PART 216 -- MINIMUM SECURITY DEVICES AND PROCEDURES
FOR FEDERAL RESERVE BANKS AND STATE MEMBER BANKS

Sec.

- 216.0 Scope of Part.
 - 216.1 Definitions.
 - 216.2 Development and administration of security procedures.
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 - 216.4 Filing of reports.
 - 216.5 Applicability to Federal Reserve Banks
 - 216.6 Penalty provision.
- Appendix A Proper employee conduct during and after a robbery.

AUTHORITY: The provisions of this Part 216 issued under sec. 3, 82 Stat. 295. Interpret or apply sec. 1, 2, 3, 4, 5, 32 Stat. 294, 295.

SECTION 216.0 -- SCOPE OF PART

Pursuant to the authority conferred upon the Board of Governors of the Federal Reserve System by section 3 of the Bank Protection Act of 1968 (32 Stat. 295), the rules contained in this Part --

(a) establish minimum standards with which each State member bank and each Federal Reserve Bank^{1/} must comply with respect to the installation, maintenance, and operation of security devices and procedures to discourage robberies, burglaries, and larcenies and to assist in the identification and apprehension of persons who commit such acts;

(b) establish time limits within which State member banks and Federal Reserve Banks shall comply with such standards; and

(c) require the submission of reports with respect to compliance.

^{1/} See section 216.5 regarding the applicability of this Part to Federal Reserve Banks.

SECTION 216.1 -- DEFINITIONS

For the purposes of this Part

(a) The term "State member bank" means any bank that is a member of the Federal Reserve System (other than a national bank or a District of Columbia bank).

(b) The term "banking office" includes the main office of any State member bank and any branch thereof.

(c) The term "branch" includes any branch bank, branch office, branch agency, additional office, or any branch place of business located in any State of the United States or in any Territory of the United States, Puerto Rico, Guam, or the Virgin Islands at which deposits are received or checks paid or money lent.

(d) The term "Board" means the Board of Governors of the Federal Reserve System.

(e) The term "teller's station or window" means a location in a banking office at which bank customers routinely conduct transactions with the bank which involve the exchange of funds, but does not include a walk-up or drive-in teller's station or window, unless otherwise indicated.

(f) The term "drive-in teller's station or window" means a teller's station or window at which a person can transact banking business without entering the structure that houses the station or window and while seated in an automobile.

(g) The term "walk-up teller's station or window" means a teller's station or window at which a pedestrian can transact banking business without entering the structure that houses the station or window.

(h) The term "banking hours" means the time during which a banking office is open for the normal transaction of business with the banking public.

SECTION 216.2 -- DEVELOPMENT AND
ADMINISTRATION OF SECURITY PROCEDURES

(a) Designation of security officer. On or before February 15, 1969, the board of directors of each State member bank shall designate an officer or other employee of the bank who shall be charged with, and who shall assume, responsibility for the administration of a security program, equal to or exceeding the minimum standards prescribed by paragraph (b) of this section, for each banking office operated or to be operated by it.

(b) Development and administration of bank security programs.

(1) Development and administration. On or before July 15, 1969, each State member bank shall develop and provide for the administration of a security program for protecting the bank, its assets, its employees, and its customers from robberies, burglaries, and larcenies. The security program developed pursuant to this paragraph shall be reduced to writing and shall be approved by the bank's board of directors.

(2) Contents of security programs. Security programs developed pursuant to subparagraph (1) of this paragraph shall --

(i) establish a schedule for the inspection, testing, and servicing of all security devices installed in each banking office; designate the officer and other employee who is responsible for seeing that such devices and mechanisms are inspected, tested, serviced, and kept in good working order; and require such officer or employee to keep a record of such inspections, testings, and servicings;

(ii) require that each banking office's cash be kept at a minimum; establish criteria defining "minimum" for this purpose; and provide procedures for safely removing excess cash;

(iii) require that the cash at each teller's station or window, including walk-up and drive-in teller's stations or windows, be kept at a minimum; establish criteria defining "minimum" for this purpose; and provide procedures for safely removing excess cash and other valuables to a locked safe, vault, or other protected place;

(iv) require that the cash at each teller's station or window, including walk-up and drive-in teller's stations or windows, include "bait" money, i.e., currency, the denominations, serial numbers and series years of which are kept in a safe place;

(v) require that all money, securities, and similar valuables be kept in a locked vault or safe during non-business hours, that the vault or safe be opened at the latest time practicable before

business hours, and that the vault or safe be locked at the earliest time practicable after business hours;

(vi) provide for the designation of a person or persons to inspect each banking office after the closing hour to assure that all money and other valuables have been put away, that the vault or safe and all doors and windows are securely locked, and that no unauthorized persons are present in the banking office;

(vii) provide for the designation of a person or persons who open each office of the bank and require him or them to inspect the premises, and ascertain that no unauthorized persons are present before other employees are permitted to enter; and

(viii) provide for training, and periodic retraining, of employees in their responsibilities under the security program, including the proper use of security devices and proper employee conduct during and after a robbery. With respect to the latter, employees shall be instructed in accordance with the procedures specifically identified in Appendix A of this Part.

(c) Filing of bank security programs with the Board. Not later than August 1, 1969, each State member bank (and each bank organized under State law that has an application for membership in the Federal Reserve System pending on that date) shall file, with the Board through the Federal Reserve Bank of the District in which the main office of the bank is located, a copy of the security program developed pursuant to paragraph (b) of this

section. Any application for membership in the Federal Reserve System filed after that date by a bank organized under State law shall be accompanied by a copy of the bank's security program. A copy of any substantial revisions of or amendments to the security program shall be filed with the Board through the appropriate Federal Reserve Bank within 30 days after approval of such revisions or amendments by the bank's board of directors.

(d) If the Board determines that a security program is deficient, the bank will be so advised and furnished a statement of the reasons why, together with a statement of what the bank must do to comply with the requirements of this Part, and the time within which the compliance action must be taken. In any such case the bank may, within thirty days after receipt of the Board's advice, file with the Board through the appropriate Federal Reserve Bank a statement of reasons why the program should be deemed acceptable, and may propose in the statement alternative compliance action(s). The filing of such a statement will suspend the running of the time set in the Board's letter of advice within which the bank was directed to take compliance action, such suspension to be effective from the date of the letter of advice until the bank receives advice of the Board's decision on the request that the program or the proposed alternative program should be deemed acceptable.

SECTION 216.3 -- INSTALLATION, MAINTENANCE,
AND OPERATION OF SECURITY DEVICES

(a) Minimum standards with respect to the installation, maintenance, and operation of security devices -- (1) General. Each State member bank shall provide for the installation, maintenance, and operation, in each banking office operated or to be operated by it, of such security devices as are herein prescribed. Such devices shall be reasonable in price in the circumstances of the bank and the office in question, and shall give good and reliable performance with a minimum risk of being rendered ineffective by unauthorized persons. Each device shall be installed and regularly inspected, tested, and serviced by competent persons, so as to assure realization of its maximum performance capabilities. Activating devices for surveillance systems and robbery alarms shall be operable with the least risk of detection by unauthorized persons that can be practicably achieved.

(2) Lighting system. A lighting system capable of illuminating during the hours of darkness

- (i) the lobby of the banking office;
- (ii) the area around the vault, if the vault is visible from outside the banking office;
- (iii) areas outside the banking office where unauthorized entry into the banking office might be attempted; and
- (iv) each walk-up or drive-in teller's station or window.

(3) Door locks and window bars, grills, or burglary-resistant devices or material. The exterior doors of each banking office shall be equipped with dead-bolt locks that are key-operated from both sides. Windows that are not readily observable from the street, and through which unauthorized entry might be attempted, shall be protected by securely fastened burglary-resistant bars or grills, unless the windows are of laminated, burglary-resistant material. Bars shall be of steel, at least one-half inch round, or one inch by one-fourth inch flat, spaced not more than five inches apart; grills shall be of steel, at least one-eighth inch material and two inch mesh; or bars and grills shall be of materials of such strength, size, and spacing as to afford at least equivalent burglary resistance.

(4) Walk-up and drive-in teller's stations or windows. Walk-up and drive-in teller's stations or windows contracted for by State member banks after the effective date of this Part shall be constructed in such a manner that tellers are effectively protected by bullet-resistant barriers from robbery or larceny by persons outside such stations or windows. Such barriers shall be of glass at least one and three-sixteenths inches thick, or of material affording at least equivalent bullet-resistance. Pass-through devices shall be so designed and constructed as not to afford a person outside the station a direct line of fire at a person inside the station.

(5) Surveillance systems -- (i) General. A surveillance system which is

(A) equipped with one or more photographic, recording, monitoring, or like devices capable of reproducing images of persons in the banking office with such clarity as will assist (through photographs capable of being enlarged to produce a one-inch vertical head-size of persons whose images have been reproduced) in the identification and apprehension of robbers or other suspicious persons;

(B) reasonably silent in operation;

(C) so designed and constructed that necessary services, repairs, or inspections can readily be made.

Any camera used in such a system shall be capable of taking at least two pictures a second and, if it uses film shall be capable of operating for not less than five minutes with a full load of film and the film shall be at least 16 mm.

(ii) Installation, maintenance, and operation of surveillance systems providing surveillance of other than walk-up or drive-in teller's stations or windows. Surveillance devices for other than walk-up or drive-in teller's stations or windows shall be

(A) located either in such a manner as to reproduce identifiable images of persons leaving the banking office or in such a manner as to reproduce identifiable images of persons in a position to transact business at each such station or window; and

(B) capable of activation by initiating devices located adjacent to bank employees commanding a view of the public space, and at each teller's station.

(iii) Installation, maintenance, and operation of surveillance systems providing surveillance of walk-up or drive-in teller's stations or windows. Surveillance devices for walk-up and drive-in teller's stations or windows shall be located in such a manner as to reproduce identifiable images of persons in a position to transact business at each such station or window and areas of such station or window that are otherwise vulnerable to robbery or larceny. Such devices shall be capable of activation by one or more initiating devices located within or in close proximity to such station or window. The requirements of this subparagraph shall not apply to a walk-up or drive-in teller's station or window in which the teller is effectively protected by a bullet-resistant barrier from persons outside the station or window, but if he is vulnerable to larceny or robbery by members of the public who enter the banking office, he shall have access to a device to activate a surveillance system that covers the area of vulnerability or the exits to the banking office.

(6) Robbery alarm systems. A robbery alarm is required for each banking office at which the police ordinarily can arrive within five minutes after an alarm is activated. Robbery alarms shall be

(i) designed to transmit a signal (not detectable by unauthorized persons) indicating that a crime against the banking office has occurred or is in progress -- either directly or through an intermediary that is responsive at all times during which the banking office is open for business -- to the police.

(ii) capable of activation by initiating devices located adjacent to bank employees commanding a view of the public space, and at each teller's station (except walk-up or drive-in teller's stations or windows in which the teller is effectively protected by a bullet-resistant barrier and effectively isolated from persons (other than fellow employees) inside a banking office of which such station or window may be a part);

(iii) safeguarded against accidental transmission of an alarm;

(iv) equipped with a visual or audible alarm signal, distinct from other signals, capable of indicating any improper functioning of or tampering with the system; and

(v) equipped with an independent source of power (such as a battery) sufficient to assure continuously reliable operation of the system in the event of failure of the usual source of power.

(7) Burglar alarm systems. A burglar alarm system

(i) capable of detecting promptly an attack on the outer door, walls, floor or ceiling of each vault, and each safe not stored in a vault, in which money, securities, or other valuables are stored when the office is closed, and any attempt to move any such safe;

(ii) capable of transmitting a signal (not detectable by unauthorized persons) indicating that any such attempt is in progress -- either directly or through an intermediary that is responsive at all times during which the banking office is not open for business -- to the police;

(iii) capable of simultaneously activating, in the case of a banking office at which the police ordinarily cannot arrive within five minutes after an alarm is activated, a loud sounding bell or other device that is audible both inside the banking office and outside the banking office for a distance of 500 feet;

(iv) safeguarded against accidental transmission of an alarm;

(v) equipped with a visual or audible alarm signal, distinct from other signals, capable of indicating any improper functioning of or tampering with the system; and

(vi) equipped with an independent source of power (such as a battery) sufficient to assure continuously reliable operation of the system in the event of failure of the usual source of power.

(8) Vaults, safes, and night depositories. Vaults and safes (if not to be stored in a vault) in which money, securities, or other valuables are to be stored when the office is closed, and night depositories, installed after the effective date of this Part shall have burglary-resistant characteristics that are appropriate in the circumstances of their intended use. Considerations relevant to determining appropriateness include, but are not limited to;

(i) the incidence of crimes against the banking office and against financial institutions in the community in which the banking office is or will be located;

(ii) the value of assets stored;

(iii) the distance of the banking office from the nearest police station and the time required for the police ordinarily to arrive at the banking office;

(iv) other security measures in effect at the banking office;
and

(v) the physical characteristics of the banking office structure. In general, vaults, safes and night depositories must conform to the following requirements, but in some cases the relevant considerations may require that higher standards be met.

(A) Vaults. -- Vault walls, roof and floor shall be made of steel-reinforced concrete, at least 18 inches thick; vault doors shall be made of steel or other drill and torch-resistant material, at least three and one-half inches thick, and be equipped with a combination time lock and a substantial, lockable day-gate.

(B) Safes. -- Safes shall weigh at least 750 pounds empty, or be securely anchored to the premises where located. The door shall be equipped with a combination lock, and with a relocking device that will effectively lock the door if the combination lock is punched. The body shall consist of steel, at least one inch in thickness, with an ultimate tensile strength of 50,000 pounds per square inch,

either cast or fabricated, and be fastened in a manner equal to a continuous one-fourth inch penetration weld having an ultimate tensile strength of 50,000 pounds per square inch. One hole not exceeding 3/16-inch diameter may be provided in the body to permit insertion of electrical conductors, but shall be located so as not to permit a direct view of the door or locking mechanism. The door shall be made of steel that is at least one and one-half inches thick, and at least equivalent in strength to that specified for the body; or safes shall be constructed of materials that afford at least equivalent burglary-resistance.

(C) Night depositories. -- Night depositories shall consist of a receptacle chest having cast, or welded, steel walls, top and bottom, at least one inch thick; a combination locked steel door at least one and one-half inches thick; and a chute, made of steel that is at least one inch thick, securely bolted or welded to the receptacle and to a depository entrance of strength similar to the chute; or be constructed of materials that afford at least equivalent burglary-resistance. The depository entrance shall be equipped with a lock and be designed, or shielded, to prevent the accumulation of dust, snow, or water within the deposit receptacle. Night depositories shall be equipped with a burglary alarm and be designed to protect against the "fishing" of a deposit from the deposit receptacle, and to protect against the "trapping" of a deposit for extraction.

(b) Reports on proposed devices. -- Not later than April 30, 1969, each State member bank (and each bank organized under State law that has an application for membership in the Federal Reserve System pending on that date) shall file with the Board through the Federal Reserve Bank for the District in which it is located a report on Form P-1 (in duplicate) for each of its offices that is subject to this Part (or that would be subject to this Part if a pending membership application, or a pending application to acquire or establish a branch office were approved), of the information described therein, including the security devices proposed to be installed and, in the case of existing offices, those already installed, if any. Applications filed after April 30, 1969, by banks organized under State law for membership in the Federal Reserve System, and applications filed after that date by State member banks for authority to acquire or establish a branch office, shall be accompanied by such reports. A report shall be filed in advance of the removal by a State member bank of its head office, or of a branch office, to a different structure, whether newly constructed or not; in advance of additions to, and of substantial modifications of, an office; in advance of the acquisition of a vault, vault door, safe, or night depository; in advance of the replacement of any security device prescribed by this Part; and in advance of any modification in measures permitted to be taken in lieu of security devices, unless such replacement or modification has been directed by the Board

pursuant to paragraph (d); and at such other times as the Board may require.

(c) Determinations of non-conformity and waiver. -- (1) A report may be accompanied by a request that the Board waive the requirement that one or more prescribed security devices be installed.^{2/} Any such request shall set forth the grounds believed to justify the granting of a waiver and describe the measures, if any, proposed to be taken in lieu of a security device, or devices.^{3/} In each case that a report is filed, the bank will be advised by the Board if the security devices proposed to be installed and, in the case of an existing office, whether any already installed, appear not to conform to the requirements of this Part and^{4/}, if a waiver is requested, whether the waiver is granted, and the time within which measures, if any, proposed to be taken in lieu of a security device, or devices, must be instituted.

(2) If the Board determines that the security devices appear not to conform to the requirements of this Part, or that a waiver

^{2/} A decision to request a waiver must be made by the bank's board of directors and the minutes must identify the directors who voted for such action and the reasons, if any, given for so voting.

^{3/} The fact that a bank has insurance protection against losses from robberies, burglaries, and larcenies will not be accepted as justification for the granting of a waiver.

^{4/} Each bank is responsible for assuring that its security devices conform to the standards prescribed by this Part; the fact that a bank does not receive advice that there are apparent non-conformities reflected in its Form P-1 report(s) does not preclude the Board from requiring corrective action with respect to devices that prove ineffective. See paragraph (d).

should not be granted, the bank will be furnished a statement of the reasons for such determination, together with a statement of what the bank must do to comply with the requirements of this Part, and the time within which such action must be taken. In any such case, the bank may, within thirty days after receipt of advice of the Board's determination, file with the Board a statement of reasons why the determination should be reversed or modified and, if the latter, how it should be modified. The filing of any such statement will suspend the running of the time set in the determination within which the bank was directed to take compliance action, such suspension to be effective from the date of the determination until the bank receives advice of the Board's decision on the request for reversal or modification.

(3) In the case of reports filed in the calendar year 1969, advice that security devices appear not to conform with the requirements of this Part, and advice on requests for waivers, will be given within 120 days of receipt of the report, unless the bank is informed within that time that the advice will be given at a later date; in the case of reports filed after the calendar year 1969, such advice will be given within 60 days of receipt of the report, unless the bank is informed within that time that the advice will be given at a later date.

(d) Corrective action; revocation of waivers. (1) Whenever the Board determines that security devices installed, maintained, and

operated by a State member bank pursuant to this Part are ineffective; it may require the bank to take necessary corrective action.

(2) Any waiver granted pursuant to paragraph (c) of this section may be revoked if the Board determines that the grounds for which the waiver was granted are no longer valid.

(3) If the Board determines that security devices are ineffective, or that a waiver should be revoked, the bank will be so notified and will be furnished a statement of the reasons for such determination, together with a statement of what the bank must do to comply with the requirements of this section and the time within which such action must be taken. In any such case the bank may, within thirty days after receipt of such notice, file with the Board through the appropriate Reserve Bank a statement of reasons why the security devices should not be deemed ineffective, or the waiver not revoked, and the compliance action not taken, and may propose in the statement alternative compliance action(s). The filing of any such statement will suspend the running of the time set in the notice within which the bank was directed to take compliance action, such suspension to be effective from the date of the notice until the bank receives advice of the Board's decision.

SECTION 216.4 -- REPORTS

(a) Compliance reports. Each State member bank shall file, with the appropriate Federal Reserve Bank annually in January, commencing

in 1970, and at such other times as the Board may require, a statement certifying to its compliance with the requirements of this Part. The statement shall be signed by the president, or cashier, or other managing officer of the bank and may be in a form substantially as follows:

"I hereby certify that this bank has developed and administers a security program that equals or exceeds the requirements of Federal Reserve Regulation P, that a current copy of such security program has been filed with the Federal Reserve Bank of the District in which the main office of this bank is located, and that each banking office operated by this bank has installed, maintains, and operates the prescribed security devices and that all such devices are in good working order[, and that any prescribed security devices not installed have been waived and measures permitted to be taken in lieu thereof are in effect, as directed by the Board]."

For the purposes of the report filed in January 1970, the bank will be regarded as in compliance with the requirements that surveillance systems and alarm systems be installed if such devices, equal to or exceeding the minimum standards prescribed by section 216.3 (a) have been ordered.

(b) Crime reports. Each time a robbery, burglary, or larceny^{5/} is perpetrated or attempted at an office of a State member bank that is subject to this Part, the bank must within five working days, file a report in conformity with the requirements of Form P-2; one copy of the report must be filed with the office of the cognizant United States District Attorney, one copy with the office of the local prosecutor's office (unless he directs otherwise), and one copy with the nearest office of the Federal Bureau of Investigation having jurisdiction; four copies must be filed with the Federal Reserve Bank for the District in which the head office of the reporting bank is located, and the Reserve Bank will retain one copy, forward one copy to the Board and two copies to the Attorney General of the United States, Washington, D. C.

(c) Special reports. Each State member bank shall file such other reports with respect to security devices and procedures as the Board may require.

^{5/} Larcenies committed or attempted by bank personnel are not required to be reported on Form P-2; such incidents, and other violations, or probable violations, of the criminal provisions of the Federal banking laws not required to be reported on Form P-2, should be reported according to instructions issued through the Federal Reserve Banks.

SECTION 216.5 -- APPLICABILITY TO FEDERAL RESERVE BANKS

The provisions of this Part apply to each Federal Reserve Bank and its branches^{6/}, except that reports and other writings required or permitted to be filed by a State member bank with the Federal Reserve Bank for the District in which it is located must, in the case of a Federal Reserve Bank, be filed with the Board; provided, however, that the applicability of the Bank Protection Act of 1968 and of this Part to Federal Reserve Banks and their branches does not preclude the Board from requiring, by virtue of its authority under other provisions of law, that Federal Reserve Banks and their branches comply with higher standards respecting the installation, maintenance, and operation of security devices and procedures than those that are prescribed by this Part.

SECTION 216.6 -- PENALTY PROVISION

A State member bank or Federal Reserve Bank that violates any provision of this Part shall be subject to a civil penalty not to exceed \$100 for each day of the violation.

^{6/} A branch of a Federal Reserve Bank means an office established pursuant to section 3 of the Federal Reserve Act (12 U.S.C. § 521).

APPENDIX A

Proper Employee Conduct During and After a Robbery

With respect to proper employee conduct during and after a robbery, employees should be instructed

(1) to avoid actions that might increase danger to themselves or others;

(2) to activate the robbery alarm system and the surveillance system during the robbery, if it appears that such activation can be accomplished safely;

(3) to observe the robber's physical features, voice, accent, mannerisms, dress, the kind of weapon he has, and any other characteristics that would be useful for identification purposes;

(4) that if the robber leaves evidence (such as a note) try to put it aside and out of sight, if it appears that this can be done safely; retain the evidence, do not handle it unnecessarily, and give it to the police when they arrive; and refrain from touching, and assist in preventing others from touching, articles or places the robber may have touched or evidence he may have left, in order that fingerprints of the robber may be obtained;

(5) to give the robber no more money than the amount he demands, and include "bait" money in the amount given;

(6) that if it can be done safely, observe the direction of the robber's escape and the description and license plate number of the vehicle used, if any;

(7) to telephone the local police, if they have not arrived, and the nearest office of the Federal Bureau of Investigation, or inform a designated officer or other employee that a robbery has been committed;

(8) that if the robber leaves before the police arrive, assure that a designated officer or other employee waits outside the office to inform the police when they arrive that the robber has left and that it is safe to enter the office;

(9) to attempt to determine the names and addresses of other persons who witnessed the robbery or the escape, and request them to record their observations or to assist a designated officer or other employee in so doing;

(10) to refrain from discussing the details of the robbery with others before recording the observations respecting the robber's physical features and other characteristics as hereinabove described and the direction of escape and description of vehicle used, if any.

6. Number of entrances or exits to lobby.
7. Number of teller stations serving lobby.
8. Number of teller stations at which business can be transacted without entering the structure.
9. Location of bank office: (Check one only)
 - a. Center city.
 - b. Suburban.
 - c. Town.
 - d. Rural.
 - e. Other, specify _____
10. Total number of robberies or attempted robberies during past five years, or since last P-1 report if this is not an initial report.
11. Total number of burglaries or attempted burglaries during past five years, or since last P-1 report if this is not an initial report.
12. Total number of nonemployee larcenies or attempted larcenies during past five years, or since last P-1 report if this is not an initial report.
13. Is an armed guard(s) stationed or to be stationed in lobby during banking hours?
 - a. Yes. How many? _____
 - b. No.
14. Is an armed guard(s) present or planned for the office during non-banking hours?
 - a. Yes. How many? _____
 - b. No.
15. Do you now, or do you expect to, contract with a central station alarm company for protection equipment or services?
 - a. Yes. Give company name and address _____
 - b. No.
16. Design of inside teller stations:
 - a. Open style, low partition.
 - b. Closed in with open grill barriers.
 - c. Protected with bullet resistant materials.
 - d. Other, specify _____

27. Are or will decalcomania notices or other posters be used to call attention to the use of cameras?
a. Yes.
b. No.
28. Are cameras sufficiently quiet when activated that they would not generally attract the attention of robbers?
a. Yes.
b. No.
29. Has all camera equipment been installed?
a. Yes. Give installation date _____
b. No. Give anticipated installation date _____
30. Are television cameras and recorders used or to be used in lieu of photographic cameras?
a. Yes. Give details of T.V. system in an attachment to this report.
b. No.
31. _____ Give distance from office to nearest law enforcement station having jurisdiction.
32. _____ Estimate of shortest time that enforcement officers could be expected to arrive at the office following a request for help. (Consult with local law enforcement officials for this information if necessary)
33. Alarm Systems: (Present or planned)
a. Not used in bank offices. Indicate why _____
b. Installed by equipment supplier.
c. Installed by bank hired local electrician.
d. Installed by central station alarm company.
e. Other, specify _____
34. Has all alarm equipment been installed?
a. Yes. Give date of installation _____
b. No. Give anticipated date of installation _____
35. Alarm signals: (Present or planned)
a. All signals are transmitted over wires or cables.
b. Some or all signals are transmitted by wireless equipment.
36. Do or will all wire type alarm circuits carry a continuous electric current or signal (commonly referred to as electronic line supervision) which is arranged to indicate circuit failure, malfunction or tampering attempts?
a. Yes.
b. No.

37. Reporting location for alarms: (Present or planned)
- a. At central station alarm company that is in service 24 hours per day.
 - b. At local law enforcement office that is in service 24 hours each day.
 - c. Other, specify _____
38. Is each teller and each other employee who has a view of customers and teller stations furnished or to be furnished with a device for activating the robbery alarm?
- a. Yes.
 - b. No. Explain _____
39. Is the alarm system provided with an emergency power supply for use in case of a regular power supply failure?
- a. Yes.
 - b. No.
40. Are the activating devices for alarms and/or cameras so constructed and located that they could probably be activated without undue risk to tellers or other employees confronted by a robber?
- a. Yes.
 - b. No. Explain _____
41. Do or will robbery alarms ring a bell or otherwise sound in the bank lobby where they might be heard and possibly anger a robber?
- a. Yes.
 - b. No.
42. Does the office have a vault(s)?
- a. Yes.
 - b. No.
43. Are vaults equipped or to be equipped with sonic or vibration detection alarms?
- a. Yes.
 - b. No.
44. Are vaults equipped or to be equipped with heat or smoke detection alarms?
- a. Yes.
 - b. No.
45. Are vaults equipped or to be equipped with any other types of alarms?
- a. Yes. Specify _____
 - b. No.

46. Are vault doors equipped or to be equipped with alarms?
a. Yes.
b. No.
47. Is any safe(s) used to secure valuables during nonwork periods constructed and protected in accordance with the requirements of Regulation P?
a. Yes.
b. No. Explain _____
48. Are such safes equipped with an alarm?
a. Yes. Specify _____
b. No.
49. Are building door-type, window-type or other intrusion detection alarms being used or to be used?
a. Yes. Specify _____
b. No.
50. Are burglarly or intrusion detection alarms connected or to be connected to a large bell or other type of noise generating device on the outside of the office?
a. Yes.
b. No.
51. Is or will the bank office lobby and/or area around the vault be kept illuminated at night?
a. Yes.
b. No. Why? _____
52. Are or will the outside areas of the bank office where unauthorized entry might be made be kept illuminated at night?
a. Yes.
b. No. Why? _____
53. Are or will all entrance and exit doors to the bank office be equipped with inside and outside key activated, dead-bolt locks?
a. Yes.
b. No. Why? _____
54. Are or will all windows and other openings (other than doors) through the building walls through which covert entry might be made be equipped with bars, grills or burglary resistant laminated material as specified in Regulation P?
a. Yes.
b. No. Explain _____

55. If there is a night depository, is it or will it be protected by an alarm?
- a. Have no night depository.
 - b. Have night depository equipped with an alarm.
 - c. Have night depository not equipped with an alarm.
56. Is the night depository constructed in accordance with the requirements of Regulation P?
- a. Yes.
 - b. No. Explain _____
57. Does the bank office have safety deposit boxes?
- a. Yes.
 - b. No.
58. If there are walk-up or drive-in teller windows facing outside the building are they protected by bullet resistant materials?
- a. Have no walk-up or drive-in windows.
 - b. Have window(s) which is protected.
 - c. Have window(s) which is not protected and not covered by a camera.
 - d. Have window(s) which is not protected but is covered by a camera.
59. Vault construction:
- a. Walls, floor and ceiling are constructed of concrete and steel _____ inches thick.
 - b. Walls, floor and ceiling are constructed of other material, Specify material and thickness _____
60. _____, thickness of vault door(s) in inches.
61. Are vault doors equipped with combination dial locks?
- a. Yes.
 - b. No.
62. Is the vault(s) equipped with a "time" lock?
- a. Yes.
 - b. No.
63. Is the vault(s) equipped with a lockable day-gate?
- a. Yes.
 - b. No.
64. Set forth below any information not adequately covered above in this report. (Attach any photographs, sketches or other material that may be helpful in describing your security plans or facilities.)

If the directors of the bank believe that the bank should be excused from compliance with the requirement that one or more security devices prescribed by Regulation P be installed, a request for waiver may be attached to this report, setting forth the grounds believed to justify the granting of a waiver and describing the measures, if any, proposed to be taken in lieu of a security device, or devices.

Signature _____

Name (type) _____

Title _____

Date _____

9. Amount of loss:

- a. \$ _____ Currency loss.
- b. \$ _____ Securities loss.
- c. \$ _____ Damage to bank property. (May be estimated)
- d. \$ _____ Other, specify _____

(IF CRIME OF ROBBERY HAS BEEN PERPETRATED OR ATTEMPTED ANSWER THIS SECTION)

10. _____ Number of robbers participating in crime.

11. Weapons:

- a. _____ Robbers had weapons or it appeared they may have had weapons. Specify kind _____
- b. _____ There was no evidence of weapons.
- c. _____ Other intimidation was used. Specify _____

12. Were robbers wearing masks or otherwise disguised?

- a. _____ No.
- b. _____ Yes. Indicate how _____

13. Was a description of the robbers obtained and recorded?

- a. _____ Yes.
- b. _____ No. Why? _____

14. Was a description and/or license number of vehicle(s) obtained?

- a. _____ Yes.
- b. _____ No. Why? _____

15. _____ Estimated minutes between beginning and end of robbery.

16. Modus Operandi:

- a. _____ Robber(s) passed a note to teller demanding money.
- b. _____ Robber(s) vocally demanded money.
- c. _____ Robber(s) subdued employees and took money from containers.
- d. _____ Other, specify _____

17. Harm to persons:

- a. _____ Neither employees nor customers were physically harmed.
- b. _____ Persons were harmed. Give details _____

18. A hostage or threat of holding a hostage was used:

- a. _____ No.
- b. _____ Yes. Give details _____

19. Was cash or valuables taken from other than teller drawers?
a. No.
b. Yes. Specify _____
20. Was "bait" money given out or taken during the robbery and was the identification of this money furnished to the law enforcement officers?
a. Yes.
b. No. Why? _____
21. Was the cash contained in the teller drawer(s) within the maximum permitted by the bank's security program?
a. Yes.
b. No. Why? _____
22. Cameras (or other surveillance device)
a. Camera(s) recorded useful pictures during this robbery. _____
b. Camera(s) did not record useful picture during this robbery. Why? _____
23. Robbery alarm:
a. Alarm was effective during this robbery. How? _____
b. Alarm was not effective during this robbery. Why? _____
24. Robber left note or other item which was retained and preserved for use of enforcement officers.
a. Yes. What? _____
b. No. Explain if necessary _____
25. Was conduct and performance of employees in conformance with Regulation P and the bank's security procedure?
a. Yes.
b. No. Explain _____

(IF CRIME OF BURGLARY HAS BEEN PERPETRATED OR ATTEMPTED ANSWER THIS SECTION)

26. How did burglars gain entrance to the premises?
a. Break-in. Where and how? _____
b. Other, specify _____
27. If break-in was through a window or other opening in walls, or roof, was the entry location protected by security devices as specified in Regulation P?
a. Yes.
b. No. Why? _____

28. Vault:
- a. No apparent attempt was made to gain access to vault.
 - b. Vault wall, floor or ceiling was penetrated or attempted.
How? _____
 - c. Vault door was opened or penetrated. How? _____
 - d. Other, specify _____
29. Were the lights required by Regulation P in good working order and turned on?
- a. Yes.
 - b. No. Explain _____
30. Were safety deposit boxes broken into or opened?
- a. No.
 - b. Yes. Indicate extent and how _____
31. Money safe:
- a. No apparent attempt made to gain access to contents.
 - b. A penetration or an attempted penetration of safe was made.
How? _____
 - c. Safe door opened or an attempt made to open. How? _____
 - d. Other, specify _____
32. Night depository:
- a. No attempt was made to gain access to contents.
 - b. Contents taken or attempted by "Fishing" or "Trapping" methods.
How, if known? _____
 - c. Night depository penetrated or access door opened. Explain _____
 - d. Other, specify _____
33. Burglary alarms:
- a. Alarms were of value in connection with this crime. How? _____
 - b. Alarms were not of value in connection with this crime.
Why? _____
34. _____ Estimated length of time during which burglary was being committed.

(IF CRIME OF NON-EMPLOYEE LARCENY HAS BEEN PERPETRATED OR ATTEMPTED ANSWER THIS SECTION)

35. Modus Operandi of larceny:
- a. Money or valuables left exposed where thief had access.
Explain _____

