



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Conditional Approval #279
July 1998

June 18, 1998

William L. Daniel
President
Rockdale National Bank
1600 Highway 20
Conyers, Georgia 30012

Re: Final Conditional Charter Approval Letter for Rockdale National Bank
Application Control Number: 97-SE-01-0007

Dear Mr. Daniel:

This letter is in regards to the final conditional charter approval letter dated October 14, 1997, authorizing you to open Rockdale National Bank, Conyers, Georgia ("Bank" -- Charter Number 23349). *See* enclosure. That letter established supervisory conditions that the Bank needed to complete to our satisfaction before implementing your proposed personal computer banking and electronic bill payment ("PC banking") service. Based upon the Bank's efforts to date to comply with the original conditions and recent discussions of the current circumstances involving [] the proposed company that will provide your PC banking service, and pursuant to your request, we have decided to amend condition #2 of the October 14, 1997 letter. Due to circumstances surrounding the proposed servicer's data center relocation, we have agreed to allow the security review to be conducted in two phases.

The amended condition #2 is as follows:

- The Bank shall have performed a security review of its PC banking platform regardless whether the platform is operated on an in-house basis or by one or more bank service companies ("servicer"). This review must be conducted by an objective and qualified computer-security specialist ("specialist"), and the scope of the review must be pre-approved by the OCC. The review can be contracted by either the Bank or servicer. The review shall be conducted in the following two phases:
 - ▶ In phase one, the specialist must conduct penetration testing and assess intrusion detection processes. This phase must be completed to the OCC's satisfaction before the Bank implements the proposed PC banking service. The specialist shall confirm by written report with reasonable certainty that the computer system allows neither

unauthorized nor undetected access and that satisfactory detection and response is provided for any attempts to gain unauthorized access to the system. The OCC will consider the results of the report as well as any subsequent actions by the Bank or servicer to implement any recommendations or to remedy any noted security or control deficiencies, as part of its decision to grant final written approval to the Bank's proposed implementation of the PC banking service.

- ▶ In phase two, the specialist must complete a comprehensive security review. This review must be completed by the earlier of 90 days after the servicer's data center relocation or December 31, 1998, unless the OCC grants an extension of the time period. The scope shall include, but not necessarily be limited to, external penetration testing and an assessment of the adequacy of internal security. This assessment should include the adequacy of physical security, adequacy of policies and their implementation, confirmation that the firewall, router, and system security configuration are consistent with policy, and review of controls against a denial of service attack. The Bank shall present a copy of the written report to the OCC. If any significant security weaknesses are found and not corrected by the servicer within a prompt time frame that is appropriate in light of the nature of the weaknesses, the Bank shall terminate the relationship with that servicer. If the Bank must terminate the relationship as described, then a specialist would also need to conduct the same comprehensive security review of a subsequent servicer or in-house platform.

The remaining conditions of the October 14, 1997 letter remain in effect as originally drafted.

The amended condition and conditions incorporated by reference shall be deemed to be conditions "imposed in writing by the agency in connection with the granting of any application or other request" within the meaning of 12 U.S.C. § 1818(b)(1).

If you have any questions, please contact me at (202) 874-5060, or alternatively, John O. Stein, Corporate Manager, in our Southeastern District Office at (404) 588-4525. You should continue to submit any written information relating to the conditional approval to Mr. Stein.

Sincerely,

/s/

John W. Graetz
Licensing Expert (Financial Analyst)
Bank Organization and Structure

Enclosure