

From: [Jeff Altenburg](#)
To: [SJUD Exhibits](#)
Subject: Legislative concept 38: Formal Request, please clarify your definition as used throughout your proposed legislation.
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Formal Request, please clarify your definition as used throughout your proposed legislation.

Reading through the proposed legislation I keep coming across the following term; Tamper-Resistant Lock.

No where in the proposal is a legal definition as to what that is.

See below:

What In The World Is A Tamper-Resistant Lock?

Security Officers Struggle with BPA Requirement
by Bob Rosberg

The recently amended Bank Protection Act (BPA) regulations call for "tamper-resistant locks on all exterior doors and exterior windows that may be opened." But there is no definition of "tamper-resistant" in the regulation, nor will you receive such a standard from your regulatory agency. Here's why.

The BPA regs were amended in 1991 to allow financial institutions to take advantage of evolving security technology, and to assign them more responsibility in assessing their risks.

So while the federal rules require tamper-resistant locks (as well as other security devices) the responsibility for selecting the hardware rests with the security officer and the board of directors. Asking your regulator for help in this matter may get you an unofficial answer suggesting you ought to have, at a minimum, locks with deadbolts containing a hardened steel core, and key-in-knob locks that cannot be easily opened by slipping a credit card between the bolt and the door jamb.

The official response will probably be a verbatim reading of the regulation and a suggestion that you find out what the industry standards are.

Research?

We interviewed representatives of lock manufacturers, locksmiths, distributors and security consultants, asking each of them, "What is meant by tamper-resistant?"

Brian Costley, director of Education for Sargent & Greenleaf lock manufacturers responded, "a lock that offers a high degree of resistance to forced entry as well as surreptitious entry from the outside." "Forced entry would include such attacks as wrenching off the lock and hammering or simply lunging against the door."

"Surreptitious entry includes picking, shimmying (i.e. inserting a piece of thin plastic or metal between the jamb and door, then working the bolt back into the lock) and decoding (i.e.

making a duplicate key)."

Costley, who is also a certified master locksmith and certified safe technician, explained that tamper resistance would also prevent someone with momentary inside access to the lock from removing its cover and discovering how it might be defeated from the outside. Therefore, a tamper-resistant lock, in his view, would be a high security device with a tamper resistant cover.

Michael Crowder, National Sales Manager for ASSA High Security Locks says, "Make sure you get a heavy duty, Grade 1 mortise lock (the type containing a deadbolt which, when installed within a door, slips well into the door jamb)."

Boston Lock & Safe Company President Harry Stoia goes even further. He is adamant about the construction of the door itself, which, in his opinion "should be 2" to 2 1/2". Door frames should have a minimal thickness of a 4"x4" stud and the bolt protrusion should be 2".

Crowder recommends the lock carry an Underwriters Laboratories (UL) mark.

Madeco Security Lock sales manager Joe Dalessio agrees. He says UL tests locks against routine attacks-wrenching, drilling, sawing, prying, pulling, driving, picking, or making a duplicate key.

However, Costley says in fairness to manufacturers who do not have their locks tested by UL, that there are some which meet and even exceed UL standards.

Locating a tamper-resistant lock to comply with the BPA requirement is not difficult. Joe Mele, Loss Prevention Specialist at the National Crime Prevention Institute provided us with a representative list of manufacturers that produce appropriate hardware.

Ed. note: If you need such a list, contact the BANKERS' HOTLINE office and we'll send it to you.

Bob Rosberg is well known to the banking security community as the Director of the Mosler Anti-Crime Bureau, and a Security Consultant to financial institutions. He will continue his discussion on tamper-resistant locks in a later issue of the HOTLINE.

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Kind regards,

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