WOWYRD · RULE REVIEW

Rule review: management summary, all business lines

Client: Demo client with 3 business lines (synthetic). Business lines: 3. Generated: 2026-11-20 10:02 UTC.

- Bank transfers: data 2022-09-01 to 2022-09-18 (daily periods), cut-off 2022-09-18, currency USD.
- SEPA transfers: data 2026-10-01 to 2026-11-29 (daily periods), cut-off 2026-11-29, currency USD.
- Mobile money: data 2017-01-01 to 2017-01-31 (daily periods), cut-off 2017-01-31, currency USD.

Demo run. The unit costs are demo values, not a client's costs. The transactions and labels are synthetic.

Internal report. Do not share it outside your firm.

This is the short management report. The extended management report (management-extended.html) and the technical report (technical.html) give the detail.

Outcome, all lines

45
Rules reviewed
Rule-hit logs and catalogues, all lines

172,002
Transactions reviewed
added counts, all lines

150,218
Alerts
added counts, all lines

8,624
Confirmed fraud caught (a rule fired)
8,624 of 9,198 (93.8%); added counts, all lines

574
Confirmed fraud missed (no rule fired)
added counts, all lines

131,082
False alarms
Mature alerts with no fraud; added counts, all lines

637,881.60 USD
False-alarm cost (estimate)
Your unit costs

BUSINESS LINE	DATA	TRANSACTIONS	ALERTS	CONFIRMED FRAUD	FRAUD WITH A RULE HIT	SHARE OF FRAUD WITH A RULE HIT	FALSE ALARMS	ANALYST HOURS ON FALSE ALARMS	FALSE-ALARM COST (ESTIMATE)
Bank transfers	2022-09-01 to 2022-09-18 (daily periods)	58,331	53,483	967	928	96.0%	50,302	5,030.2	249,889.60 USD
SEPA transfers	2026-10-01 to 2026-11-29 (daily periods)	59,161	42,310	2,078	1,570	75.6%	35,155	3,515.5	168,992.00 USD
Mobile money	2017-01-01 to 2017-01-31 (daily periods)	54,510	54,425	6,153	6,126	99.6%	45,625	4,562.5	219,000.00 USD
Total	**all lines**	**172,002**	**150,218**	**9,198**	**8,624**	**93.8%**	**131,082**	**13,108.2**	**637,881.60 USD**

Totals add counts. A share in the total row is computed again from the added counts, never by averaging the lines' shares. All lines use USD, so amounts are added too. Each line name opens that line's own report.

Top proposal per business line

BUSINESS LINE	ACTION	TYPE	EXPECTED EFFECT (BACKTEST)	CONFIDENCE
Bank transfers	Retire rule Money sent to 5+ different recipients within 5 days (fan-out): 0.5% of its 39,145 alerts with a known outcome were fraud `tp_u21_fan_out_5_benef_5d`: Finds one sender spreading money to many receivers in a short time.	Retire the rule	7,624 fewer alerts, 40 caught fraud cases lost, 36,403.20 USD saved (estimate)	medium
SEPA transfers	Retire rule Many small payments in, then sent out within a day: 2.9% of its 621 alerts with a known outcome were fraud `tp_ffiec_small_in_rapid_out_24h`: Finds an account that collects several small payments and passes most of the money on at once.	Retire the rule	1 fewer alerts, 0 caught fraud cases lost, 4.80 USD saved (estimate)	high
Mobile money	Retire rule Money from 5+ different senders into one account within 5 days (fan-in): 2.4% of its 28,140 alerts with a known outcome were fraud `tp_ffiec_fan_in_5_senders_5d`: Finds one account that collects money from many people, as a collection or mule account does.	Retire the rule	58 fewer alerts, 7 caught fraud cases lost, 244.80 USD saved (estimate)	medium

The top action of each line, from a backtest on that line's own period. Effects of different lines are not added: they come from different periods and rule sets.

What changed since the previous report

- Bank transfers: No previous report was given, so this report is treated as the first one. There is nothing to compare with yet. The next run can compare with this one.
- SEPA transfers: No previous report was given, so this report is treated as the first one. There is nothing to compare with yet. The next run can compare with this one.
- Mobile money: No previous report was given, so this report is treated as the first one. There is nothing to compare with yet. The next run can compare with this one.

Regulatory status by regulator

> **Not legal advice. This report maps your rules to requirements, in our own short wording. It is not legal advice. You decide how you comply.**

Regulatory statuses as of 2026-11-11 (library date). Check them again before you rely on this report.

REGULATOR	SOURCE	STATUS	RESULTS ON YOUR FILES	AS OF	OFFICIAL SOURCE
Ukraine	NBU Resolution No. 51 of 14.05.2026	in force since 20.05.2026; 6 months to comply	**Bank transfers**: 3 not measurable from these files **SEPA transfers**: 3 not measurable from these files **Mobile money**: 3 not measurable from these files	2026-11-11	bank.gov.ua
	NBU draft of 17.07.2026	draft, not in force	**Bank transfers**: 2 gap, 5 partly met **SEPA transfers**: 1 gap, 6 partly met **Mobile money**: 4 gap, 3 partly met	2026-11-11	bank.gov.ua
	NBU Resolution No. 54 of 27.05.2026	in force; grace period ended 02.09.2026	**Bank transfers**: 1 not measurable from these files **SEPA transfers**: 1 not measurable from these files **Mobile money**: 1 not measurable from these files	2026-11-11	bank.gov.ua
	NBU Resolution No. 116 of 07.10.2026	in force since 10.10.2026; 3 months to align internal procedures	**Bank transfers**: 2 not measurable from these files **SEPA transfers**: 2 not measurable from these files **Mobile money**: 2 not measurable from these files	2026-11-11	bank.gov.ua

REGULATOR	SOURCE	STATUS	RESULTS ON YOUR FILES	AS OF	OFFICIAL SOURCE
	Bill 16013	adopted by the Rada 28.10.2026; presidential signature not confirmed	**Bank transfers**: 1 not measurable from these files **SEPA transfers**: 1 not measurable from these files **Mobile money**: 1 not measurable from these files	2026-11-11	itd.rada.gov.ua
EU	EU Payment Services Regulation	agreed, not adopted	**Bank transfers**: 1 not measurable from these files **SEPA transfers**: 1 not measurable from these files **Mobile money**: 1 not measurable from these files	2026-11-11	oeil.europarl.europa.eu
UK	UK PSR Specific Direction 20; Financial Ombudsman Service guidance	in force	**Bank transfers**: 1 not measurable from these files **SEPA transfers**: 1 not measurable from these files **Mobile money**: 1 not measurable from these files	2026-11-11	psr.org.uk
	FCA PS24/17, Financial Crime Guide	guidance in force	**Bank transfers**: 1 partly met **SEPA transfers**: 1 partly met **Mobile money**: 1 partly met	2026-11-11	fca.org.uk
US	3 NYCRR 504.3	in force	**Bank transfers**: 1 partly met, 1 not measurable from these files **SEPA transfers**: 1 partly met, 1 not measurable from these files **Mobile money**: 1 partly met, 1 not measurable from these files	2026-11-11	dfs.ny.gov
	FFIEC BSA/AML Examination Manual, suspicious-activity monitoring	guidance	**Bank transfers**: 1 partly met **SEPA transfers**: 1 partly met **Mobile money**: 1 partly met	2026-11-11	bsaaml.ffiec.gov

Rows citing the NBU draft of 17.07.2026 — draft, not in force: its text can change before adoption. Resolutions 51, 54 and 116 are in force. Bill 16013 is a Ukrainian bill, shown here with its status. Our own short wording, not the regulator's text. The extended report lists each check; the technical report gives each finding and its evidence.

Requirements changed since the last review

Your rules are mapped to current requirements. We flag when a new requirement affects them. We follow official publications of regulators in Ukraine, the EU, the UK and the US.

Requirements library read on 2026-11-11. No change file was given for this run, so no changed requirement is listed here.

Requirements still open since the previous report

Each business line's own report lists the requirements still open since its previous report, with the regulator's guidance and public cases. Not legal advice.

Where the detail is

- Extended management report (management-extended.html): charts, the top five proposals, coverage by fraud type, each changed requirement and each regulatory check.
- Technical report (technical.html): method, per-rule numbers, every proposal with its evidence and caveats, the run record and the rule glossary.
- Each business line has its own short, extended and technical report. A line name in the table above opens that line's short report.