WOWYRD · RULE REVIEW

Rule review: technical report

Client: Demo client with its own rule file (own-rules, synthetic). Data: 2026-08 to 2026-10 (monthly periods). Cut-off: 2026-10-01 (given with --cutoff). Generated: 2026-11-20 10:02 UTC.

Demo run. The unit costs are demo values, not a client's costs. The transactions and labels are synthetic. For this demo we set the logged hits of the declining rule "Wire total from one sender in a week" to 'decline' so the log matches the rule file. Other rules that fired on the same payments now show them as declined too.

Internal report. Do not share it outside your firm.

Method and definitions

The review measures what the client's own engine logged. Only the section "Your imported rules" replays the rule definitions the client gave, and that replay never replaces a logged number. Label delay: 14 days. Hits newer than 2026-10-01 minus the label delay are not yet mature. One alert takes 6 analyst minutes at 0.80 USD per minute. A declined payment that was not fraud costs 4.00 USD in customer friction. The client entered these costs. Every cost in this report is an estimate from them.

- A **hit** is a transaction on which the rule fired, from the client's rule-hit log. An **alert** is a transaction with at least one hit.
- A hit is **mature** when the transaction is older than the client's stated label delay at the cut-off, so a fraud label had time to arrive. Immature hits are reported, never counted as false alarms or as friction.
- The **label** of a transaction is the label row with the latest date known at or before the cut-off. A later label that arrives after the cut-off is not used.
- A **declined** payment has no outcome (selective labels): its hits are counted and reported, and left out of precision and false-alarm counts.
- **Evaluable** = mature and not declined. **Caught** = evaluable with a fraud label. **False alarm** = evaluable with no fraud and no disputed label. **Disputed** = evaluable with a disputed label: it is neither caught nor a false alarm, it is shown on its own, and it is left out of precision.
- **Precision** = caught / (caught + false alarms). **Recall share** = caught / all evaluable fraud in the period.
- **Alert cost**: one alert per transaction with any hit, whatever the number of rules; a false alarm costs analyst minutes x cost per minute, shared equally among the rules that fired on it. **Friction**: a mature declined payment with no fraud and no disputed label costs the client's friction cost, shared the same way.
- **Decay**: precision of the last three mature periods is at most half of the three before (needs six periods).

Totals

MEASURE	VALUE
Transactions	1,950
Alerts (transactions with at least one hit)	723
Alerts not yet mature (newer than the label delay)	140
Alerts on declined payments (no outcome; left out of precision)	80

MEASURE	VALUE
Confirmed fraud (label known by the cut-off)	103
Confirmed fraud with at least one hit	82
Evaluable fraud (mature, not declined)	66
False alarms	450
Declined payments with no fraud or disputed label (friction)	42
False-alarm cost (estimate)	2,328.00 USD
Rule-hit rows that matched a transaction	1,950 of 1,950 (100.0%)
Label rows that matched a transaction	639 of 639 (100.0%)

Source: transactions, rule-hit log and labels files, 2026-08 to 2026-10.

Per-rule metrics

Rules are sorted by false-alarm cost, highest first. The trend line shows precision per period.

RULE	HITS	NOT YET MATURE	DECLINED	EVALUABLE	CAUGHT	FALSE ALARMS	PRECISION	RECALL SHARE	COST (USD)	DECAYED	PRECISION TREND
tp_u21_transfer_over_500 No description supplied by the client	701	138	71	492	41	443	8.5%	62.1%	2,092.07 USD	No	
tp_u21_large_txn_9k No description supplied by the client	80	15	9	56	19	36	34.5%	28.8%	90.93 USD	No	
tp_u21_wire_total_gt4999_7d No description supplied by the client	95	15	80	0	0	0	no data	0.0%	83.67 USD	No	no data
tp_ffiec_fan_in_5_senders_5d No description supplied by the client	24	7	0	17	11	6	64.7%	16.7%	23.20 USD	No	
tp_u21_fan_out_5_benef_5d No description supplied by the client	25	4	1	20	13	7	65.0%	19.7%	20.20 USD	No	
tp_u21_wire_count_gt2_7d No description supplied by the client	22	0	18	4	2	2	50.0%	3.0%	17.93 USD	No	

Hits and precision per period

Each cell: hits / precision in that period.

RULE	2026-08	2026-09	2026-10
tp_ffiec_fan_in_5_senders_5d No description supplied by the client	15 / 73.3%	9 / 0.0%	0 / no data
tp_u21_fan_out_5_benef_5d No description supplied by the client	16 / 60.0%	9 / 80.0%	0 / no data
tp_u21_large_txn_9k No description supplied by the client	41 / 34.3%	39 / 35.0%	0 / no data
tp_u21_transfer_over_500 No description supplied by the client	373 / 9.6%	318 / 6.2%	10 / no data
tp_u21_wire_count_gt2_7d No description supplied by the client	20 / 66.7%	2 / 0.0%	0 / no data
tp_u21_wire_total_gt4999_7d No description supplied by the client	51 / no data	44 / no data	0 / no data

What changed since the previous report

Compared with the previous report, which covers data up to 2026-08-27 (35 days earlier). Its numbers are as measured at its own cut-off: labels that matured later are not added to it.

Per rule

Sorted by the size of the change in alerts, largest first. Precision is shown only with at least 30 hits with a known outcome in each run. Hit rate = alerts / transactions.

RULE	ALERTS THEN	ALERTS NOW	CHANGE	PRECISION THEN	PRECISION NOW	CHANGE	HIT RATE THEN	HIT RATE NOW
tp_u21_transfer_over_500	324	701	+116%	3.3%	8.5%	+5.1 points	37.6%	35.9%
tp_u21_wire_total_gt4999_7d	32	95	+197%	no data	no data	not measured	3.7%	4.9%
tp_u21_large_txn_9k	36	80	+122%	no data	34.5%	not measured	4.2%	4.1%
tp_u21_wire_count_gt2_7d	5	22	+340%	no data	no data	not measured	0.6%	1.1%
tp_u21_fan_out_5_benef_5d	15	25	+67%	no data	no data	not measured	1.7%	1.3%
tp_ffiec_fan_in_5_senders_5d	15	24	+60%	no data	no data	not measured	1.7%	1.2%
R-509	0	0	no change	no data	no data	not measured	0.0%	0.0%
R-610	0	0	no change	no data	no data	not measured	0.0%	0.0%
R-900	0	0	no change	no data	no data	not measured	0.0%	0.0%

Rules added and removed

Added: none.

Removed: none.

Threshold changes

No threshold changed.

Requirements

No requirement file was given for this run, so requirement changes are not compared.

Recommendations from the previous report

Of the previous report's 7 recommendations: 0 changed as proposed, 0 partly changed, 2 not changed, 5 where we cannot tell.

Too few dated changes for a median (0; at least 3 needed).

Open recommendations by age: 7 up to 30 days, 0 of 31–90 days, 0 over 90 days.

Days count from the first report that made each recommendation. A change dated before that report, a change with no exact date and an upper bound ("at most") are shown but not counted. This is a measurement on your own records, not a judgement of your change process.

REFERENCE	NO. IN THE PREVIOUS REPORT	RECOMMENDATION	STATUS	SOURCE	CHANGE DATE	FIRST RECOMMENDED	DAYS TO CHANGE	DATES	BEFORE → AFTER	PREDICTED	AGAINST THE PREDICTION
REC–73309477	1	Turn off rule tp_u21_transfer_over_500	Not changed.	your rule file	not known	2026-11-20, in 1 report	open 0 days, in 1 report	–	Not measured.	Predicted: 9.5 fewer alerts per day (estimated on your data).	–
REC–16a49a98	2	Add a rule for: Gambling winnings arrive with no deposits, then card transfers follow	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	–	Not measured.	No effect was estimated for this recommendation.	–
REC–fc5701c9	3	Add a rule for: Large loans are taken and repaid again and again	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	–	Not measured.	No effect was estimated for this recommendation.	–
REC–5ff2bbff	4	Add a rule for: One type of operation makes up an unusual share of a user's activity	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	–	Not measured.	No effect was estimated for this recommendation.	–
REC–8078ec06	5	Add a rule for: Payment purposes do not fit the merchant's category code	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	–	Not measured.	No effect was estimated for this recommendation.	–
REC–05f946b2	6	Add a rule for: Regular transfers to a personal account look like business activity	Cannot tell: no change record or rule file covers it, and your data cannot show this kind of change.	none	not known	2026-11-20, in 1 report	open 0 days, in 1 report	–	Not measured.	No effect was estimated for this recommendation.	–
REC–d74333d3	7	Rule tp_u21_transfer_over_500, check 1: threshold 500 → 1000	Not changed.	your rule file	not known	2026-11-20, in 1 report	open 0 days, in 1 report	–	Not measured.	Predicted: 0.9 fewer alerts per day (backtest on past data).	–

Observed after the change, not proven to be caused by it. Traffic, fraud patterns and other changes in the same weeks also move these numbers. A status is about your own change, not about any regulation. This is a measurement for the rule owner, not an audit of your change process.

Changes not linked to our recommendations

None.

Overlaps between rules

RULE A	RULE B	JACCARD	TRANSACTIONS HIT BY BOTH
tp_u21_wire_count_gt2_7d	tp_u21_wire_total_gt4999_7d	0.18	18
tp_u21_transfer_over_500	tp_u21_wire_total_gt4999_7d	0.12	85
tp_u21_large_txn_9k	tp_u21_transfer_over_500	0.11	80
tp_u21_large_txn_9k	tp_u21_wire_total_gt4999_7d	0.07	12
tp_u21_fan_out_5_benef_5d	tp_u21_transfer_over_500	0.03	22
tp_u21_transfer_over_500	tp_u21_wire_count_gt2_7d	0.02	17
tp_ffiec_fan_in_5_senders_5d	tp_u21_transfer_over_500	0.02	17
tp_u21_fan_out_5_benef_5d	tp_u21_wire_count_gt2_7d	0.02	1
tp_ffiec_fan_in_5_senders_5d	tp_u21_large_txn_9k	0.01	1
tp_u21_fan_out_5_benef_5d	tp_u21_wire_total_gt4999_7d	0.01	1
tp_ffiec_fan_in_5_senders_5d	tp_u21_fan_out_5_benef_5d	0.00	0
tp_ffiec_fan_in_5_senders_5d	tp_u21_wire_count_gt2_7d	0.00	0
tp_ffiec_fan_in_5_senders_5d	tp_u21_wire_total_gt4999_7d	0.00	0
tp_u21_fan_out_5_benef_5d	tp_u21_large_txn_9k	0.00	0
tp_u21_large_txn_9k	tp_u21_wire_count_gt2_7d	0.00	0

Rules that never fired

No rule catalogue was given. A rule that never fired is not in the rule-hit log, so it cannot be listed. Inputs unknown.

Proposals

No written effectiveness threshold was given. The retire line is the fraud rate of all payments with a known outcome.

Effects are backtests on past data, not forecasts.

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01 **Add a rule for: Gambling winnings arrive with no deposits, then card transfers follow**

Reference `REC-16a49a98`. Quote this reference in your change record.

Add a missing fraud type | Confidence: low | Priority: 50.0

Rules: none.

Expected effect: no effect estimate for this proposal.

Evidence

- Needs these data fields: customer_id, mcc, operation_type.
- No rule catalogue was given, so we cannot see whether a rule covers it.
- Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.

Caveats

- Selective labels: 95 alerts were on declined payments. Their outcome is unknown, so they are left out of precision and of fraud caught.
- Label maturity: 140 alerts are newer than the 14-day label delay. They are not counted as false alarms.
- Short history: the data covers 3 calendar month(s). Trends need at least 6.
- Synthetic data: the transactions, labels and unit costs are demo values, not a client's data.
- UA-NBU-S07 (Gambling winnings arrive with no deposits, then card transfers follow) is a sign from an NBU draft resolution. It is a draft, not law.

Sources:

- UA-NBU-S07 (Gambling winnings arrive with no deposits, then card transfers follow)

02 Add a rule for: Large loans are taken and repaid again and again

Reference `REC-fc5701c9`. Quote this reference in your change record.

Add a missing fraud type | Confidence: low | Priority: 50.0

Rules: none.

Expected effect: no effect estimate for this proposal.

Evidence

- Needs these data fields: customer_id, operation_type, amount.
- No rule catalogue was given, so we cannot see whether a rule covers it.
- Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.

Caveats

- Selective labels: 95 alerts were on declined payments. Their outcome is unknown, so they are left out of precision and of fraud caught.
- Label maturity: 140 alerts are newer than the 14-day label delay. They are not counted as false alarms.
- Short history: the data covers 3 calendar month(s). Trends need at least 6.
- Synthetic data: the transactions, labels and unit costs are demo values, not a client's data.
- UA-NBU-S05 (Large loans are taken and repaid again and again) is a sign from an NBU draft resolution. It is a draft, not law.

Sources:

- UA-NBU-S05 (Large loans are taken and repaid again and again)

03 Add a rule for: One type of operation makes up an unusual share of a user's activity

Reference `REC-5ff2bbff`. Quote this reference in your change record.

Add a missing fraud type | Confidence: low | Priority: 50.0

Rules: none.

Expected effect: no effect estimate for this proposal.

Evidence

- Needs these data fields: customer_id, operation_type, amount.
- No rule catalogue was given, so we cannot see whether a rule covers it.
- Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.

Caveats

- Selective labels: 95 alerts were on declined payments. Their outcome is unknown, so they are left out of precision and of fraud caught.
- Label maturity: 140 alerts are newer than the 14-day label delay. They are not counted as false alarms.
- Short history: the data covers 3 calendar month(s). Trends need at least 6.
- Synthetic data: the transactions, labels and unit costs are demo values, not a client's data.
- UA-NBU-S02 (One type of operation makes up an unusual share of a user's activity) is a sign from an NBU draft resolution. It is a draft, not law.

Sources:

- UA-NBU-S02 (One type of operation makes up an unusual share of a user's activity)

04 Add a rule for: Payment purposes do not fit the merchant's category code

Reference `REC-8078ec06`. Quote this reference in your change record.

Add a missing fraud type | Confidence: medium | Priority: 50.0

Rules: none.

Expected effect: no effect estimate for this proposal.

Evidence

- Needs these data fields: mcc, payment_purpose.
- No rule catalogue was given, so we cannot see whether a rule covers it.
- It cannot be covered on this data: the transactions file has no category-code or no payment-purpose column (see UA-NBU51-01 (The acquirer passes payee (merchant) name and category code to the issuer. Check that these fields are filled in your data. Most time-relevant item: the deadline is about 20.11.2026)).
- Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.

Caveats

- Selective labels: 95 alerts were on declined payments. Their outcome is unknown, so they are left out of precision and of fraud caught.
- Label maturity: 140 alerts are newer than the 14-day label delay. They are not counted as false alarms.
- Short history: the data covers 3 calendar month(s). Trends need at least 6.
- Synthetic data: the transactions, labels and unit costs are demo values, not a client's data.
- UA-NBU-S11 (Payment purposes do not fit the merchant's category code) is a sign from an NBU draft resolution. It is a draft, not law.

Sources:

- UA-NBU-S11 (Payment purposes do not fit the merchant's category code)
- UA-NBU51-01 (The acquirer passes payee (merchant) name and category code to the issuer. Check that these fields are filled in your data. Most time-relevant item: the deadline is about 20.11.2026)

05 Add a rule for: Regular transfers to a personal account look like business activity

Reference `REC-05f946b2`. Quote this reference in your change record.

Add a missing fraud type | Confidence: low | Priority: 50.0

Rules: none.

Expected effect: no effect estimate for this proposal.

Evidence

- Needs these data fields: account_type, counterparty_id, ts, amount.
- No rule catalogue was given, so we cannot see whether a rule covers it.
- Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.

Caveats

- Selective labels: 95 alerts were on declined payments. Their outcome is unknown, so they are left out of precision and of fraud caught.
- Label maturity: 140 alerts are newer than the 14-day label delay. They are not counted as false alarms.
- Short history: the data covers 3 calendar month(s). Trends need at least 6.
- Synthetic data: the transactions, labels and unit costs are demo values, not a client's data.
- UA-NBU-S08 (Regular transfers to a personal account look like business activity) is a sign from an NBU draft resolution. It is a draft, not law.

Sources:

- UA-NBU-S08 (Regular transfers to a personal account look like business activity)

Your imported rules

You gave your rule definitions with a consent line from Demo: synthetic data, no real client, dated 2026-11-12. Engine: demo engine (synthetic). The collector replayed each rule on your transactions inside your environment and compared the replay with your engine's hit log, rule ID by rule ID. The replay never replaces a logged number: every number in the other sections comes from your hit log. The replay keeps and uses only the columns your rule file names, and it never opens the labels file.

Agreement = transactions where both fired, divided by transactions where either fired. A what-if needs an agreement of at least 0.95 and at least 10 hits on either side. Rows in a windowed rule's first window are left out (warm-up): the replay has no history from before your file starts. An empty cell makes a check false and is counted.

Format of the rule file: Download an example rule file (JSON, with a note on every key; replace its example consent line before you use it).

Agreement with your engine's log

YOUR RULE	ACTION	LOGGED HITS	REPLAY HITS	BOTH	LOGGED ONLY	REPLAY ONLY	AGREEMENT	STATUS	ROWS LEFT OUT (WARM-UP)	ROWS WITH EMPTY CELLS	UNREADABLE VALUES
Single transfer above 9000 `tp_u21_large_txn_9k` (agreement with your engine's log: 88%)	review	80	90	80	0	10	88%	Below the agreement floor	0	0	0
Transfer above 500 `tp_u21_transfer_over_500` (agreement with your engine's log: 100%)	review	701	701	701	0	0	100%	Agrees	0	0	0
One sender pays five or more receivers in five days `tp_u21_fan_out_5_benef_5d` (agreement with your engine's log: 100%)	alert	25	25	25	0	0	100%	Agrees	152	0	0
More than two wires from one sender in a week `tp_u21_wire_count_gt2_7d` (agreement with your engine's log: 100%)	review	22	22	22	0	0	100%	Agrees	208	81	0
Wire total from one sender in a week `tp_u21_wire_total_gt4999_7d` (agreement with your engine's log: 100%)	decline	89	89	89	0	0	100%	Agrees	208	81	0
Five or more senders pay one account in five days `tp_ffiec_fan_in_5_senders_5d` (agreement with your engine's log: 100%)	review	24	24	24	0	0	100%	Agrees	152	0	0
Device risk score from the vendor `R-509` (agreement: not replayable)	review	0	–	–	–	–	–	Not replayable	–	–	–
One device used by several customers `R-610` (agreement: not replayable)	alert	0	–	–	–	–	–	Not replayable	–	–	–
Very large transfer after a quiet spell `R-900` (agreement: cannot be compared)	review	0	45	0	0	45	–	Cannot be compared	0	0	0

Differences to check

Up to five of your own transaction IDs per kind, so you can find the translation error. They stay in this internal report.

- Single transfer above 9000 `tp_u21_large_txn_9k` (agreement with your engine's log: 88%): logged only 0; replay only 10 (for example ctx-00522, ctx-00531, ctx-00668, ctx-00725, ctx-01170). **Most differences are at exactly the threshold. Check 'more than' against 'at least'.**

Not replayable

- Device risk score from the vendor `R-509` (agreement: not replayable): You marked this rule as not expressible: Uses the vendor's device score, which is not in our transaction export. Its logged numbers stay as your engine logged them.
- One device used by several customers `R-610` (agreement: not replayable): It needs the column device_id, which your transactions file does not have. Its logged numbers stay as your engine logged them.

What-if on past data

Wire total from one sender in a week `tp_u21_wire_total_gt4999_7d` (agreement with your engine's log: 100%, measured at your current threshold)

Check #2: the total amount with the same sender id in 7 days is more than 4999, counting only transactions where channel is "wire". Your engine's log has 89 hits for this rule after the warm-up; the replay at your current threshold is the base of every change below.

THRESHOLD	HITS (THIS RULE)	CAUGHT (THIS RULE)	FALSE ALARMS (THIS RULE)	NOT YET MATURE (THIS RULE)	OUTCOME UNKNOWN (THIS RULE)	ALERTS, ALL RULES	FALSE-ALARM COST CHANGE VS YOUR CURRENT THRESHOLD (ESTIMATE, USD)
your current threshold	89	0	0	15	74	662	–
6000	70 (-19)	0 (0)	0 (0)	8 (-7)	62 (-12)	662 (0)	5.60 USD
8000	37 (-52)	0 (0)	0 (0)	5 (-10)	32 (-42)	660 (-2)	12.00 USD

Hits, caught, false alarms, not yet mature and outcome unknown count this rule's own hits. "Alerts, all rules" counts every payment any of your rules alerted on, once: a payment another rule alerts anyway does not change it. The cost change prices the alerted good payments of all rules together, as the false-alarm cost in the rest of this report does: analyst time when the payment was not declined, your friction cost when it was, never both. A rule that declines payments declines its hits.

- 6000: Across all your rules, on your history this threshold would have raised the same number of alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised the same number of false alarms, and the false-alarm cost would have been 5.60 USD higher (an estimate from your unit costs). On your history, this rule alone would have raised 19 fewer alerts; your other rules alerted on those payments anyway, so the total does not change. This rule declines the payments it hits, so a changed threshold can raise the false-alarm cost. On your history, 7 good payments that this rule declined would not have been declined at this threshold; your other rules alerted on them anyway, so each would have cost analyst time (4.80 USD) instead of your friction cost (4.00 USD).
- 8000: Across all your rules, on your history this threshold would have raised 2 fewer alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised the same number of false alarms, and the false-alarm cost would have been 12.00 USD higher (an estimate from your unit costs). On your history, this rule alone would have raised 52 fewer alerts; your other rules alerted on 50 of those payments anyway. This rule declines the payments it hits, so a changed threshold can raise the false-alarm cost. On your history, 20 good payments that this rule declined would not have been declined at this threshold; your other rules alerted on them anyway, so each would have cost analyst time (4.80 USD) instead of your friction cost (4.00 USD). On your history, 1 good payment that only this rule alerted on would not have been alerted on at this threshold, so it would have cost nothing instead of your friction cost (4.00 USD).

> Backtest on past data, not a forecast. A changed threshold can change how fraudsters behave.

> A payment that was declined has no outcome. Hits on declined payments are counted as 'outcome unknown', not as caught or as false alarms. A rule that declines payments hides the fraud it stopped, so 'caught' can be lower than the real number.

> This collector changes no live rule. A threshold change goes through your own change and approval process.

Transfer above 500 `tp_u21_transfer_over_500` (agreement with your engine's log: 100%, measured at your current threshold)

Check #1: amount is more than 500. Your engine's log has 701 hits for this rule after the warm-up; the replay at your current threshold is the base of every change below.

THRESHOLD	HITS (THIS RULE)	CAUGHT (THIS RULE)	FALSE ALARMS (THIS RULE)	NOT YET MATURE (THIS RULE)	OUTCOME UNKNOWN (THIS RULE)	ALERTS, ALL RULES	FALSE-ALARM COST CHANGE VS YOUR CURRENT THRESHOLD (ESTIMATE, USD)
your current threshold	701	41	443	138	71	723	–
1000	653 (-48)	34 (-7)	410 (-33)	131 (-7)	70 (-1)	684 (-39)	-158.40 USD
2000	537 (-164)	20 (-21)	344 (-99)	104 (-34)	62 (-9)	602 (-121)	-456.00 USD

Hits, caught, false alarms, not yet mature and outcome unknown count this rule's own hits. "Alerts, all rules" counts every payment any of your rules alerted on, once: a payment another rule alerts anyway does not change it. The cost change prices the alerted good payments of all rules together, as the false-alarm cost in the rest of this report does: analyst time when the payment was not declined, your friction cost when it was, never both. A rule that declines payments declines its hits.

- 1000: Across all your rules, on your history this threshold would have raised 39 fewer alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised 33 fewer false alarms, and the false-alarm cost would have been 158.40 USD lower (an estimate from your unit costs). On your history, this rule alone would have raised 48 fewer alerts, 33 of them false alarms, 7 of them caught fraud cases; your other rules alerted on 9 of those payments anyway.
- 2000: Across all your rules, on your history this threshold would have raised 121 fewer alerts and caught the same fraud cases. Across all your rules, on your history this threshold would have raised 95 fewer false alarms, and the false-alarm cost would have been 456.00 USD lower (an estimate from your unit costs). On your history, this rule alone would have raised 164 fewer alerts, 99 of them false alarms, 21 of them caught fraud cases; your other rules alerted on 43 of those payments anyway.

> Backtest on past data, not a forecast. A changed threshold can change how fraudsters behave.

> A payment that was declined has no outcome. Hits on declined payments are counted as 'outcome unknown', not as caught or as false alarms. A rule that declines payments hides the fraud it stopped, so 'caught' can be lower than the real number.

> This collector changes no live rule. A threshold change goes through your own change and approval process.

Single transfer above 9000 `tp_u21_large_txn_9k` (agreement with your engine's log: 88%, measured at your current threshold)

What-if refused for Single transfer above 9000: its replay is below the agreement floor, so a what-if would carry the translation error.

Side by side with WoWyrd rules

Each of your rules next to the WoWyrd rule for the same fraud type and the requirement it relates to. A link found by the rule's name says "please check".

YOUR RULE	FRAUD TYPE AND WOWYRD RULE	REQUIREMENT IT RELATES TO
Single transfer above 9000 `tp_u21_large_txn_9k` (agreement with your engine's log: 88%) Trigger: amount is at least 9000. Action: review. Logged hits: 80. Replay: Below the agreement floor.	No fraud type in our library matches this rule. Add a typology ID to the rule file.	No requirement in our library relates to this rule.
Transfer above 500 `tp_u21_transfer_over_500` (agreement with your engine's log: 100%) Trigger: amount is more than 500. Action: review. Logged hits: 701. Replay: Agrees.	No fraud type in our library matches this rule. Add a typology ID to the rule file.	No requirement in our library relates to this rule.
One sender pays five or more receivers in five days `tp_u21_fan_out_5_benef_5d` (agreement with your engine's log: 100%) Trigger: the number of different receiver id values with the same sender id in 5 days is at least 5. Action: alert. Logged hits: 25. Replay: Agrees.	**One payer sends to far more payees than similar payers** `UA-NBU-S15` WoWyrd rule available: One account pays many different payees `account_many_payees`; numbers: not run on your data	`UA-NBU-S15` One payer sends to far more payees than similar payers: NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua
More than two wires from one sender in a week `tp_u21_wire_count_gt2_7d` (agreement with your engine's log: 100%) Trigger: channel is "wire" and the number of transactions with the same sender id in 7 days is more than 2, counting only transactions where channel is "wire". Action: review. Logged hits: 22. Replay: Agrees.	**Many operations of one type in a short time, incoming or outgoing** `UA-NBU-S03` WoWyrd rule available: Many requests from one account in an hour, then a payout `payout_velocity_1h`; A burst of operations of one type `same_operation_type_burst`; numbers: not run on your data	`UA-NBU-S03` Many operations of one type in a short time, incoming or outgoing: NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua
Wire total from one sender in a week `tp_u21_wire_total_gt4999_7d` (agreement with your engine's log: 100%) Trigger: channel is "wire" and the total amount with the same sender id in 7 days is more than 4999, counting only transactions where channel is "wire". Action: decline. Logged hits: 95. Replay: Agrees.	No fraud type in our library matches this rule. Add a typology ID to the rule file.	No requirement in our library relates to this rule.

YOUR RULE	FRAUD TYPE AND WOWYRD RULE	REQUIREMENT IT RELATES TO
Five or more senders pay one account in five days `tp_ffiec_fan_in_5_senders_5d` (agreement with your engine's log: 100%) Trigger: the number of different sender id values with the same receiver id in 5 days is at least 5. Action: review. Logged hits: 24. Replay: Agrees.	**matched by name: please check** **Many operations of one type in a short time, incoming or outgoing** `UA–NBU–S03` WoWyrd rule available: Many requests from one account in an hour, then a payout `payout_velocity_1h`; A burst of operations of one type `same_operation_type_burst`; numbers: not run on your data **Many payers send to one payee, far more than for similar payees** `UA–NBU–S16` WoWyrd rule available: Many senders pay one account `inbound_sender_fan_in`; One payee shared by several customers `beneficiary_reuse`; numbers: not run on your data **Many different senders pay one account within a short time** `OR–01` WoWyrd rule available: Many senders pay one account `inbound_sender_fan_in`; numbers: not run on your data	**matched by name: please check** `UA–NBU–S03` Many operations of one type in a short time, incoming or outgoing: NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua `UA–NBU–S16` Many payers send to one payee, far more than for similar payees: NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua `UA–16013–01` Passing cards, account access or payment data to fraudsters becomes a crime. Detect and restrict accounts used as drops. Status: adopted by the Rada 28.10.2026; presidential signature not confirmed; as of 2026-11-11. itd.rada.gov.ua FinCEN advisories and alerts (money-mule red flags). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed FFIEC BSA/AML Examination Manual, Appendix F (red flags). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed Unit21 recommended rules (2024 public copies). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed `EU–PSR–04` Monitor both outgoing and incoming payments for fraud. Status: agreed, not adopted (EU Payment Services Regulation; adoption expected by 12.2026); as of 2026-11-11. oeil.europarl.europa.eu `UK–PSR–01` Sending and receiving providers share APP scam refunds; a claim has a maximum level. Status: in force since 07.10.2024; as of 2026-11-11. psr.org.uk `UK–FCA–01` Monitor incoming as well as outgoing payments, with money-mule signs. Status: consultation; comments close 24.12.2026; as of 2026-11-11. fca.org.uk `US–NACHA–02` Receiving banks monitor incoming credits, including new, dormant and mule accounts. Status: in force: phase 1 20.03.2026, phase 2 22.06.2026; as of 2026-11-11. nacha.org
Device risk score from the vendor `R–509` (agreement: not replayable) Trigger: not expressible in the rule file. Action: review. Logged hits: 0. Replay: Not replayable.	**matched by name: please check** **One device fingerprint is used by unrelated users** `UA–NBU–S13` WoWyrd rule available: One device used by several customers `multi_account_device`; numbers: not run on your data	**matched by name: please check** `UA–NBU–S13` One device fingerprint is used by unrelated users: NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua
One device used by several customers `R–610` (agreement: not replayable) Trigger: the number of different sender id values with the same device id in 1 day is at least 3. Action: alert. Logged hits: 0. Replay: Not replayable.	**One device fingerprint is used by unrelated users** `UA–NBU–S13` WoWyrd rule available: One device used by several customers `multi_account_device`; numbers: not run on your data	`UA–NBU–S13` One device fingerprint is used by unrelated users: NBU draft, Annex 2 sign. Status: draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law); as of 2026-11-11. bank.gov.ua

YOUR RULE	FRAUD TYPE AND WOWYRD RULE	REQUIREMENT IT RELATES TO
Very large transfer after a quiet spell `R-900` (agreement: cannot be compared) Trigger: amount is more than 20000. Action: review. Logged hits: 0. Replay: Cannot be compared.	**A dormant account suddenly moves large amounts** `OR-04` WoWyrd rule: planned	FFIEC BSA/AML Examination Manual, Appendix F (red flags). Status: public red-flag references; own wording; as of 2026-11-11. No official page confirmed `UK-FCA-01` Monitor incoming as well as outgoing payments, with money-mule signs. Status: consultation; comments close 24.12.2026; as of 2026-11-11. fca.org.uk `US-FFIEC-AF-06` Large amounts soon after opening; a dormant account suddenly active. Status: guidance; as of 2026-11-11. bsaaml.ffiec.gov `US-NACHA-02` Receiving banks monitor incoming credits, including new, dormant and mule accounts. Status: in force: phase 1 20.03.2026, phase 2 22.06.2026; as of 2026-11-11. nacha.org

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.

Threshold search on your history

For each number threshold of your rules that agree with your engine's log, the collector tried 16 values from half to double the current one. It picked the best value on the earlier 70% of the payments with a known outcome and kept it only if it also did better on the later 30%, which the pick never saw. Target: the most confirmed fraud caught by all your rules, with no more alerts than today.

Backtest on past data, not a forecast. Nothing changes until you approve it in your own engine. A changed threshold can change how fraudsters behave.

RULE	CHECK	CURRENT	PROPOSED	WHY
REC−d74333d3 tp_u21_transfer_over_500	amount is more than 500	500	**1000**	Threshold 500 → 1000: catches the same confirmed fraud with 15 fewer alerts, precision 7% → 6%, false-alarm cost 43.20 USD lower on the later 30% of your history.

tp_u21_transfer_over_500, check 1: amount is more than 500

Earlier part: before 2026-09-03; later part: from that date.

On the later 30%:

THRESHOLD	ALERTS (ALL RULES)	RULE HITS	CAUGHT	FALSE ALARMS	PRECISION	FALSE-ALARM COST (USD)
current 500	310	301	9	128	6.6%	688.00 USD
best on earlier data 1000	295	283	7	119	5.6%	644.80 USD

Every value tried, on the earlier 70%:

THRESHOLD	ALERTS (ALL RULES)	RULE HITS	CAUGHT	FALSE ALARMS	PRECISION	FALSE-ALARM COST (USD)
250	732	728	42	626	6.3%	3,113.60 USD
300	670	665	41	565	6.8%	2,820.80 USD
350	607	600	39	504	7.2%	2,532.80 USD
400	537	527	35	436	7.4%	2,211.20 USD
425	511	500	33	412	7.4%	2,096.00 USD
450	478	466	33	378	8.0%	1,937.60 USD
475	447	434	32	347	8.4%	1,793.60 USD
500 (current)	413	400	32	315	9.2%	1,640.00 USD
525	411	397	31	313	9.0%	1,630.40 USD
550	409	395	31	311	9.1%	1,620.80 USD
575	408	394	31	310	9.1%	1,616.00 USD

THRESHOLD	ALERTS (ALL RULES)	RULE HITS	CAUGHT	FALSE ALARMS	PRECISION	FALSE-ALARM COST (USD)
600	408	394	31	310	9.1%	1,616.00 USD
650	404	390	31	306	9.2%	1,596.80 USD
750	404	389	30	306	8.9%	1,596.80 USD
875	397	381	30	299	9.1%	1,563.20 USD
1000	389	370	27	291	8.5%	1,524.80 USD

Not searched

- tp_u21_large_txn_9k: not searched: the replay does not match your engine's hits (below the agreement floor).
- tp_u21_fan_out_5_benef_5d: not searched: an AML rule has no labels below its threshold, so a lower threshold would look free. Use the below-the-line sample for this rule.
- tp_u21_wire_count_gt2_7d: not searched: an AML rule has no labels below its threshold, so a lower threshold would look free. Use the below-the-line sample for this rule.
- tp_u21_wire_total_gt4999_7d, check 1: not searched: only number thresholds compared with more than or less than can be searched.
- tp_u21_wire_total_gt4999_7d, check 2: not searched: too little labelled history (0 hits with a known outcome in the search part, 0 in the check part; at least 30 and 10 are needed).
- tp_ffiec_fan_in_5_senders_5d: not searched: an AML rule has no labels below its threshold, so a lower threshold would look free. Use the below-the-line sample for this rule.
- R-509: not searched: the rule cannot be replayed on your files.
- R-610: not searched: the rule cannot be replayed on your files.
- R-900: not searched: the rule's ID is not in your hit log, so its replay cannot be checked.

Below-the-line sample (AML rules)

AML rules have no labels below the threshold: nobody reviews a payment the rule did not flag. For each number threshold of a rule marked aml, the collector picked up to 20 payments in each of 3 bands just under the line (each band 10% of the threshold). Your analysts review them in `btl-sample.csv`: write suspicious or not_suspicious in analyst_label. The next run reads the file with --btl-labels and shows the share marked suspicious. The file holds transaction IDs: it stays inside your environment and is never in the summary. The order is fixed by your token key and the seed "wowyrd-btl", so a re-run gives the same list. Nothing here changes a score.

RULE	CHECK	BAND	PAYMENTS IN BAND	SAMPLED	SUSPICIOUS	SUSPICIOUS SHARE
tp_u21_fan_out_5_benef_5d	the number of different receiver id values with the same sender id in 5 days is at least 5	from 4 below 5	41	20	0 of 17	0.0%
tp_u21_fan_out_5_benef_5d	the number of different receiver id values with the same sender id in 5 days is at least 5	from 3 below 4	141	20	2 of 20	10.0%
tp_u21_fan_out_5_benef_5d	the number of different receiver id values with the same sender id in 5 days is at least 5	from 2 below 3	537	20	0 of 20	0.0%
tp_u21_wire_count_gt2_7d	the number of transactions with the same sender id in 7 days is more than 2, counting only transactions where channel is "wire"	more than 1 up to 2	56	20	–	–
tp_ffiec_fan_in_5_senders_5d	the number of different sender id values with the same receiver id in 5 days is at least 5	from 4 below 5	15	15	1 of 6	16.7%
tp_ffiec_fan_in_5_senders_5d	the number of different sender id values with the same receiver id in 5 days is at least 5	from 3 below 4	96	20	4 of 20	20.0%
tp_ffiec_fan_in_5_senders_5d	the number of different sender id values with the same receiver id in 5 days is at least 5	from 2 below 3	451	20	1 of 20	5.0%

- tp_u21_wire_count_gt2_7d, check 2: band 2 would start at 0 or below.

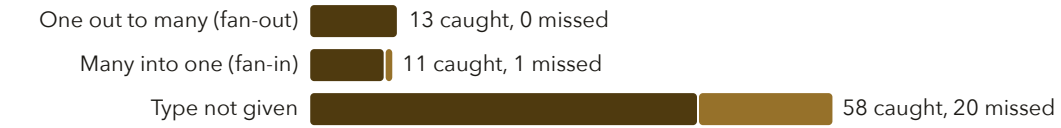
Of the reviewed payments just under this threshold, this share was marked suspicious by your analysts. A high share means the threshold may be too high. It is not projected to all payments.

Not sampled

- tp_u21_wire_count_gt2_7d, check 1: not sampled: only number thresholds compared with more than or less than have a line to go under.

Coverage by fraud type

Fraud types present in your labels



LABELLED FRAUD CASES PER TYPE. BLUE: A RULE FIRED ON THE PAYMENT. ORANGE: NO RULE FIRED. SOURCE: LABELS FILE AND RULE-HIT LOG, LABELS KNOWN BY THE CUT-OFF.

FRAUD TYPE	LABELLED CASES	CAUGHT	MISSED	LIBRARY TYPES IT MATCHES	YOUR RULES' COVERAGE	WOWYRD
One out to many (fan-out)	13	13	0	One payer sends to far more payees than similar payers (UA-NBU-S15), One account pays many new beneficiaries (OR-07)	Covered	WoWyrd rule available: One account pays many different payees `account_many_payees`
Many into one (fan-in)	12	11	1	Many payers send to one payee, far more than for similar payees (UA-NBU-S16), Many different senders pay one account within a short time (OR-01)	Covered	WoWyrd rule available: Many senders pay one account `inbound_sender_fan_in`; One payee shared by several customers `beneficiary_reuse`
Type not given	78	58	20	none	Unknown	WoWyrd rule: planned

Not in this dataset, so it cannot be measured here

Your labels hold no case of these types, so this data cannot show whether your rules catch them. This is not a gap in your rules. The rules column lists catalogue rules whose names match the type.

LIBRARY TYPE	ID	YOUR RULES WHOSE NAMES MATCH	SOURCES	WOWYRD
One user holds many more accounts or cards than similar users	`UA-NBU-S01`	none	UA-NBU-S01	WoWyrd rule: planned
One type of operation makes up an unusual share of a user's activity	`UA-NBU-S02`	none	UA-NBU-S02	WoWyrd rule available: One type of operation dominates an account `operation_type_concentration`
Many operations of one type in a short time, incoming or outgoing	`UA-NBU-S03`	none	UA-NBU-S03	WoWyrd rule available: Many requests from one account in an hour, then a payout `payout_velocity_1h`; A burst of operations of one type `same_operation_type_burst`
Balance stays low although large amounts pass through	`UA-NBU-S04`	none	UA-NBU-S04	WoWyrd rule available: Large amounts pass through an account that keeps a low balance `low_balance_high_turnover`
Large loans are taken and repaid again and again	`UA-NBU-S05`	none	UA-NBU-S05	WoWyrd rule available: Large loans taken and repaid again and again `loan_issue_repayment_churn`

LIBRARY TYPE	ID	YOUR RULES WHOSE NAMES MATCH	SOURCES	WOWYRD
Money comes in and leaves fast, little balance stays	UA-NBU-S06	none	UA-NBU-S06	WoWyrd rule available: Money leaves soon after it arrives rapid_pass_through
Gambling winnings arrive with no deposits, then card transfers follow	UA-NBU-S07	none	UA-NBU-S07	WoWyrd rule available: Gambling winnings with no gambling deposits gambling_winnings_without_deposits
Regular transfers to a personal account look like business activity	UA-NBU-S08	none	UA-NBU-S08	WoWyrd rule available: A personal account paid by many payers personal_account_business_activity
A new merchant's volume is far above similar merchants, then the merchant closes	UA-NBU-S09	none	UA-NBU-S09	WoWyrd rule available: A merchant with little history suddenly busy low_history_merchant_spike
Merchant account inflows mirror its outflows (transit)	UA-NBU-S10	none	UA-NBU-S10	WoWyrd rule available: A business account pays out almost all it receives business_account_transit
Payment purposes do not fit the merchant's category code	UA-NBU-S11	none	UA-NBU-S11	WoWyrd rule available: Payment purpose does not fit the merchant's business payment_purpose_atypical_for_mcc; Card payment to a person without category or purpose acquiring_to_person_missing_data
Contacts, device, apps, IMEI, operating system or network address change often	UA-NBU-S12	none	UA-NBU-S12	WoWyrd rule available: Payout right after an email or phone change contact_change_to_payout; One session from several network addresses session_multiple_ips; One account used from many devices account_many_devices
One device fingerprint is used by unrelated users	UA-NBU-S13	none	UA-NBU-S13	WoWyrd rule available: One device used by several customers multi_account_device
Two operations are too far apart to travel between in the time	UA-NBU-S14	none	UA-NBU-S14	WoWyrd rule available: Locations too far apart for the time between them impossible_travel
Most of an incoming amount leaves again within hours	OR-02	none	FINCEN, EUROPOL-EMMA, FIU-UA	WoWyrd rule available: Money leaves soon after it arrives rapid_pass_through
A new account gets large or many credits soon after opening	OR-03	none	UNIT21, UK-FINANCE	WoWyrd rule available: A new account receives a large credit new_account_large_incoming_credit; A new account paid by several people new_account_inbound_fan_in
A dormant account suddenly moves large amounts	OR-04	none	FFIEC-APPF	WoWyrd rule: planned
Repeated amounts just under a reporting or limit threshold	OR-05	none	FFIEC-APPF	WoWyrd rule available: Payments just under a limit just_below_threshold_payment; Many small payments from one account add up to a large sum amount_structuring_account; Many small payments to one payee add up to a large sum amount_structuring_beneficiary
Repeated round amounts with no business reason	OR-06	none	FFIEC-APPF	WoWyrd rule available: Several payments in large round amounts repeated_round_amounts
Outgoing payments per hour above the customer's usual level	OR-08	none	UNIT21, EBA-GL-2021-02	WoWyrd rule available: More payments in an hour than the customer usually makes high_customer_velocity_1h; Many requests from one account in an hour, then a payout payout_velocity_1h
A large first payment to a payee never paid before	OR-09	none	UK-FINANCE, UK-PSR	WoWyrd rule available: A large payment to a payee added just before new_payee_high_amount
Many senders' accounts share one beneficiary	OR-10	none	WOWYRD-SPIKE, FINCEN	WoWyrd rule available: One payee shared by several customers beneficiary_reuse

LIBRARY TYPE	ID	YOUR RULES WHOSE NAMES MATCH	SOURCES	WOWYRD
Money goes round in a circle between accounts within days	OR–11	none	FATF-REF, FIU-UA	WoWyrd rule: planned
An amount far above the customer's own history	OR–12	none	EBA-GL-2021-02, NBU-DRAFT	WoWyrd rule available: A payment far above the customer's usual amount `amount_far_above_customer_average`
Many small credits, then one large debit	OR–13	none	EUROPOL-EMMA, FIU-UA	WoWyrd rule available: Many small credits, then one large payout `many_small_credits_then_large_payout`
Credits from many different banks into one account	OR–14	none	FIU-UA, FINCEN	WoWyrd rule available: Credits from many different banks into one account `inbound_from_many_banks`
Transfers to or from high-risk jurisdictions	OR–15	none	FATF-REF, FFIEC-APPF	WoWyrd rule available: A payment to or from a high-risk country `high_risk_jurisdiction_counterparty`
Cash withdrawn right after a credit arrives	OR–16	none	FINCEN, FIU-UA	WoWyrd rule available: Cash taken out soon after money arrives `cash_withdrawal_after_credit`
The payee name does not match and the payment still goes	OR–17	none	UK-PSR, EU-PSR	WoWyrd rule available: Paid although the payee name did not match `payee_name_mismatch_paid`
The payment reference mentions investment, crypto or a 'safe account'	OR–18	none	UK-FINANCE	WoWyrd rule available: The payment reference uses common scam wording `payment_reference_scam_wording`
An older customer suddenly sends a large amount to a new payee	OR–19	none	FINCEN	WoWyrd rule available: An older customer sends a large amount to a new payee `older_customer_new_payee_large`
Activity at hours unusual for the customer	OR–20	none	NBU-DRAFT	WoWyrd rule available: Activity at an hour unusual for the customer `unusual_hour_for_customer`

New in our reference set since your last report

Our reference set: version v0.7.0, published 2026-11-18 (built into this collector).

Our reference set has not changed since your last report (version v0.7.0).

Incoming payments and money-mule signs

Incoming payments not measured: your transactions file has no direction column (for example direction, with values such as in and out).

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.

> **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.**

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

Your rules may not cover requirement UA-NBU-01, “Review every rule at least monthly by back-testing it”

Review every rule at least monthly by back-testing it. (NBU draft §16(10), §65-66, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Gap), and it is still open. Now: Partly met.

The data covers 3 calendar month(s), 2026-08-03 to 2026-10-01. A monthly back-test needs one run per month; a trend needs 6 months. This run splits the data by month into 3 periods.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned):

- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.
- FCA, 2024: a public case on this kind of gap.

Your rules may not cover requirement UA-NBU-02, “Metric 1: compare how often each rule fired with how many payments were actually stopped”

Metric 1: compare how often each rule fired with how many payments were actually stopped. (NBU draft §60(1), status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

Measured: 22.3%; no written threshold to compare against (§62). 6 rules fired 947 times; 211 of those hits were on stopped payments (22.3%). The per-rule table is in the technical report.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover requirement UA-NBU-03, “Metric 2: share of fraud value that was prevented, out of all fraud value”

Metric 2: share of fraud value that was prevented, out of all fraud value. (NBU draft §60(2), status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

Measured: 37.2%; no written threshold to compare against (§62). Fraud value stopped: 37.2% (239,475.00 of 643,715.00 USD). Fraud value with any alert: 99.2% (638,657.25 USD). Whether reviewed alerts were stopped is not in the decision log.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover requirement UA-NBU-04, “Set rule-effectiveness thresholds in writing. A rule under its threshold gets an immediate review”

Set rule-effectiveness thresholds in writing. A rule under its threshold gets an immediate review. (NBU draft §62-64, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Gap), and it is still open. Now: Gap.

No written effectiveness threshold was given. As a pointer: 0 of 2 rules with at least 30 alerts with a known outcome catch fraud at or under the base fraud rate of 4.7%.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned; transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover requirement UA-NBU-05, “Record a review decision for every rule: keep, adjust or cancel”

Record a review decision for every rule: keep, adjust or cancel. (NBU draft §68-69, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

No recorded decisions in your files. Recommended decisions: cancel 0, adjust 0, keep 2. 4 rules have fewer than 30 alerts with a known outcome, so no decision is recommended. The decision itself is yours to record.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned):

- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.
- FCA, 2024: a public case on this kind of gap.

Your rules may not cover requirement UA-NBU-09, “Reconcile payment operations every day”

Reconcile payment operations every day. (NBU draft §16, §18, §2, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

Days reviewed: 60 (2026-08-03 to 2026-10-01; UTC days). Days with no payments: 0. Payments with no row in the rule-hit log: 0. Rule-hit rows with no payment: 0. No ledger was given, so amounts were not reconciled. Give your settlement or ledger export with --ledger to reconcile them. This checks your exports. Whether your staff reconcile every day is a process question: answer it in the assessment checklist.

We found no implementation guidance from the regulator for this requirement.

We found no public enforcement case for this kind of gap.

Your rules may not cover requirement UA-NBU-11, “Have evidence ready for a supervisor: documents, rules, risk markers”

Have evidence ready for a supervisor: documents, rules, risk markers. (NBU draft §19, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

This report maps each finding to a requirement ID and its status (20 requirements). Your written rules, risk markers and staff interviews stay with you.

We found no implementation guidance from the regulator for this requirement.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned; transaction monitoring not effective or not calibrated to the firm's risks):

- NBU, 2026: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- NYDFS, 2025: a public case on this kind of gap.

Your rules may not cover requirement US-NYDFS-01, “Analyse scenarios, rules and thresholds on an ongoing basis”

Analyse scenarios, rules and thresholds on an ongoing basis. (3 NYCRR 504.3, status as of 2026-11-11). The previous report (data up to 2026-08-27) found it too (Partly met), and it is still open. Now: Partly met.

This run analyses 6 rules over 3 periods by month (3 calendar month(s)). Ongoing analysis means running it every month.

How the regulator describes doing this:

- Final transaction monitoring and filtering program regulation (3 NYCRR 504), press release (NYDFS, 2016-06-30), dfs.ny.gov.

Public cases where a regulator named the same kind of gap (monitoring rules, scenarios or thresholds not reviewed, tested or tuned):

- NYDFS, 2025: a public case on this kind of gap.
- NBU, 2026: a public case on this kind of gap.
- FCA, 2024: a public case on this kind of gap.

Resolved since the previous report

- Requirement UK-FCA-02, “Test and review rules; a poorly calibrated rule set the firm cannot explain is poor practice”: No gap found in your data in this report (was Partly met in the report with data up to 2026-08-27).
- Requirement US-FFIEC-01, “Tune and validate monitoring; justify each threshold”: No gap found in your data in this report (was Partly met in the report with data up to 2026-08-27).

Not legal advice. Your compliance team decides how a requirement applies to you. Public cases show how regulators have treated the same kind of gap; they do not predict an outcome for you.

Regulatory checks 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.

Checks are grouped by the regulator that sets the requirement. Each row gives the requirement ID, our own short wording of it, the result on your files, and the source's status on the date shown. Our wording is a summary, not the regulator's text.

Checks per NBU requirements

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.

REQUIREMENT ID	NBU DRAFT PARAGRAPH	OUR WORDING	RESULT	FINDING	EVIDENCE	SOURCE STATUS	AS OF	OFFICIAL SOURCE
UA-NBU51-01	–	The acquirer passes payee (merchant) name and category code to the issuer. Check that these fields are filled in your data. Most time-relevant item: the deadline is about 20.11.2026.	Not measurable from these files	Your transactions file has no payee-name or category-code column. Add them to the export so this can be measured. Without them no rule can check payment purpose against category code.	Transactions file: 1,950 rows; columns checked: payee_name, merchant_name, recipient_name, receiver_name, beneficiary_name, mcc, merchant_category_code.	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
UA-NBU-01	§66	Review every rule at least monthly by back-testing it. (NBU draft §66; library item UA-NBU-01.)	Partly met	The data covers 3 calendar month(s), 2026-08-03 to 2026-10-01. A monthly back-test needs one run per month; a trend needs 6 months. This run splits the data by month into 3 periods.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
UA-NBU-02	§60	Metric 1: compare how often each rule fired with how many payments were actually stopped. (NBU draft §60(1); library item UA-NBU-02.)	Partly met	Measured: 22.3%; no written threshold to compare against (§62). 6 rules fired 947 times; 211 of those hits were on stopped payments (22.3%). The per-rule table is in the technical report.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days. First rules: tp_ffiec_fan_in_5_senders_5d 24 hits, 0 stopped; tp_u21_fan_out_5_benef_5d 25 hits, 1 stopped; tp_u21_large_txn_9k 80 hits, 12 stopped; tp_u21_transfer_over_500 701 hits, 85 stopped; tp_u21_wire_count_gt2_7d 22 hits, 18 stopped; tp_u21_wire_total_gt4999_7d 95 hits, 95 stopped.	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua

REQUIREMENT ID	NBU DRAFT PARAGRAPH	OUR WORDING	RESULT	FINDING	EVIDENCE	SOURCE STATUS	AS OF	OFFICIAL SOURCE
UA-NBU-03	§60	Metric 2: share of fraud value that was prevented, out of all fraud value. (NBU draft §60(2); library item UA-NBU-03.)	Partly met	Measured: 37.2%; no written threshold to compare against (§62). Fraud value stopped: 37.2% (239,475.00 of 643,715.00 USD). Fraud value with any alert: 99.2% (638,657.25 USD). Whether reviewed alerts were stopped is not in the decision log.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days. 103 payments labelled fraud.	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
UA-NBU-04	§62	Set rule-effectiveness thresholds in writing. A rule under its threshold gets an immediate review. (NBU draft §62; library item UA-NBU-04.)	Gap	No written effectiveness threshold was given. As a pointer: 0 of 2 rules with at least 30 alerts with a known outcome catch fraud at or under the base fraud rate of 4.7%.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
UA-NBU-05	§68–69	Record a review decision for every rule: keep, adjust or cancel. (NBU draft §68–69; library item UA-NBU-05.)	Partly met	No recorded decisions in your files. Recommended decisions: cancel 0, adjust 0, keep 2. 4 rules have fewer than 30 alerts with a known outcome, so no decision is recommended. The decision itself is yours to record.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
UA-NBU-11	–	Have evidence ready for a supervisor: documents, rules, risk markers.	Partly met	This report maps each finding to a requirement ID and its status (20 requirements). Your written rules, risk markers and staff interviews stay with you.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
UA-NBU51-02	–	Show the acquirer's full name before an online payment; receipts show payee, commission, purpose and category code.	Not measurable from these files	Your transactions file has no receipt column for the 1,220 acquiring payments (a card channel). Add the category code, payee name, payment purpose and commission to the export so this can be measured. This checks the data in your export, not your payment page or your receipts. Showing the acquirer's full name before an online payment stays a checklist question.	Transactions file; columns looked for: mcc, merchant_category_code, payee_name, merchant_name, recipient_name, receiver_name, beneficiary_name, payment_purpose, purpose, purpose_category, payment_reference, reference, narrative, commission, commission_amount, fee, fee_amount.	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua

REQUIREMENT ID	NBU DRAFT PARAGRAPH	OUR WORDING	RESULT	FINDING	EVIDENCE	SOURCE STATUS	AS OF	OFFICIAL SOURCE
UA-NBU-09	–	Reconcile payment operations every day.	Partly met	Days reviewed: 60 (2026-08-03 to 2026-10-01; UTC days). Days with no payments: 0. Payments with no row in the rule-hit log: 0. Rule-hit rows with no payment: 0. No ledger was given, so amounts were not reconciled. Give your settlement or ledger export with --ledger to reconcile them. This checks your exports. Whether your staff reconcile every day is a process question: answer it in the assessment checklist.	Transactions file and rule-hit log, by UTC day.	draft (NBU draft resolution on control of payment operations, published 2026-07-17; not law)	2026-11-11	bank.gov.ua
UA-NBU51-03	–	Acquiring for natural persons only for allowed categories, with the required data passed to the issuer.	Not measurable from these files	Checklist question. The files do not show this.	Answer in the assessment checklist.	in force since 20.05.2026; 6 months to comply (about 20.11.2026)	2026-11-11	bank.gov.ua
UA-NBU54-01	–	Non-bank providers that acquire payments need an authorisation; the sanctions pause has ended.	Not measurable from these files	Checklist question. The files do not show this.	Answer in the assessment checklist.	in force; grace period ended 02.09.2026	2026-11-11	bank.gov.ua
UA-NBU116-01	–	Remote verification of natural persons uses the updated procedure with credit-bureau data.	Not measurable from these files	Checklist question. The files do not show this.	Answer in the assessment checklist.	in force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027)	2026-11-11	bank.gov.ua
UA-NBU116-02	–	Reports to the State Financial Monitoring Service go only through the e-cabinet, with numbered registers.	Not measurable from these files	Checklist question. The files do not show this.	Answer in the assessment checklist.	in force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027)	2026-11-11	bank.gov.ua
UA-16013-01	–	Passing cards, account access or payment data to fraudsters becomes a crime. Detect and restrict accounts used as drops.	Not measurable from these files	Checklist question. The files do not show this.	Answer in the assessment checklist.	adopted by the Rada 28.10.2026; presidential signature not confirmed	2026-11-11	itd.rada.gov.ua

Checks per EU requirements

REQUIREMENT ID	OUR WORDING	RESULT	FINDING	EVIDENCE	SOURCE STATUS	AS OF	OFFICIAL SOURCE
EU–PSR–05	When a payee name check fails because of the payee's provider, that provider compensates the payer's provider. Keep evidence of the name check on received transfers.	Not measurable from these files	Your transactions file has no payee name-check result. Add it to measure received transfers with a name mismatch or no check.	Columns looked for: name_check_result, payee_check_result, cop_result, vop_result, name_check.	agreed, not adopted (EU Payment Services Regulation; adoption expected by 12.2026)	2026-11-11	oeil.europarl.europa.eu

Checks per UK requirements

REQUIREMENT ID	OUR WORDING	RESULT	FINDING	EVIDENCE	SOURCE STATUS	AS OF	OFFICIAL SOURCE
UK–PSR–03	A claim may carry an excess of up to 100 GBP, never for vulnerable customers.	Not measurable from these files	Checklist question. The files do not show this.	Answer in the assessment checklist.	in force	2026-11-11	psr.org.uk
UK–FCA–02	Test and review rules; a poorly calibrated rule set the firm cannot explain is poor practice.	No gap found in your data	0 rules or thresholds look poorly calibrated on your data (none); 0 catalogue rules never fired. Every proposal gives a plain-word reason.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.	guidance in force	2026-11-11	fca.org.uk

Checks per US requirements (FinCEN, NYDFS, FFIEC, Nacha, Federal Reserve)

FinCEN and Nacha items are not checked from your files in this run; the rows below are NYDFS and FFIEC items.

REQUIREMENT ID	OUR WORDING	RESULT	FINDING	EVIDENCE	SOURCE STATUS	AS OF	OFFICIAL SOURCE
US–NYDFS–01	Analyse scenarios, rules and thresholds on an ongoing basis.	Partly met	This run analyses 6 rules over 3 periods by month (3 calendar month(s)). Ongoing analysis means running it every month.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.	in force	2026-11-11	dfs.ny.gov
US–NYDFS–02	Test rules before and after they go live.	Not measurable from these files	The files do not show when each rule went live, so before-and-after tests cannot be checked. A replay of a new rule on past data can serve as the test before go-live.	Rule catalogue has no go-live date.	in force	2026-11-11	dfs.ny.gov
US–FFIEC–01	Tune and validate monitoring; justify each threshold.	No gap found in your data	0 tuning proposals (none). Each states its evidence on past data.	Source: your decision log and fraud labels, 2026-08-03 to 2026-10-01, labels known by 2026-10-01, label delay 14 days.	guidance	2026-11-11	bsaaml.ffiec.gov

Other checks

No other checks in this run.

Run record

The files, code and parameters of this run, so it can be repeated.

ITEM	VALUE	SOURCE
Input file: costs	c16cdd870af20772bbd68af79c07cc73a2f8d124f64c743e1132667ff4b97882	SHA-256
Input file: decisions	1110cb52381a513a562c9fd1b7c37f694cd1810c754b781153d021a094a03382	SHA-256
Input file: labels	eded2ebdcc0f80849fefb75cad06bdf5be9afece13ff5772c58f890ec5ac7af6	SHA-256
Input file: transactions	6a96e6d94f0d00cfd5a51ab22df5abb094b6c661bfae66dcc63f873af1d3212e	SHA-256
Collector version	v0.7.0-11-gba7bd7b03d5199dd42d1810a9e4294cde08c03a4	git commit
Generation time	2026-11-20 10:02 UTC	run time
cutoff	2026-10-01T22:21:00+00:00	client
label delay days	14	client
min cell	10	default
min join coverage	0.95	default
period	month	client
threshold	not given	not given
tokens for all rules	False	default
Regulatory library	2026-11-11	statuses as of this date
Requirement change file	not given	--changes
Client rule file	296c2bb6ecd9cc43c25d19cde0fce613a62000ec94d590eaf74e396b506d1c80	SHA-256; 9 rules
Consent line	Demo: synthetic data, no real client, 2026-11-12: Demo file. A made-up client allows the collector to replay these made-up rule definitions on made-up payments.	the rule file
Agreement floor	0.95	default
What-if values tried	tp_u21_wire_total_gt4999_7d: 6000, 8000; tp_u21_transfer_over_500: 1000, 2000; tp_u21_large_txn_9k: 10000	--what-if
Tool map	not given	--tools or a tool column in the catalogue
Ledger export	not given	--ledger
Reference set source	built into this collector	
Reference set version	v0.7.0	published 2026-11-18
Reference set file	e96e792983d3748de554ba3b49a15291c8d4110f1778795555caff0fa81ee119	SHA-256
Previous report state	5093c9ecc6a39e5c50581f18cd95d93d5f379e1055c8bd7ea0a6d73381c82163	SHA-256; --previous

ITEM	VALUE	SOURCE
Below-the-line seed	wowyrd-btl	default
Below-the-line payments per band	20	default
Threshold search target	alerts-cap	--search-target
Threshold search grid (x current)	0.50, 0.60, 0.70, 0.80, 0.85, 0.90, 0.95, 1.00, 1.05, 1.10, 1.15, 1.20, 1.30, 1.50, 1.75, 2.00	earlier 70% search, later part check
Labelled below-the-line sample	`47a4bb93725e00723784fdf985cdfd2067dbac544617e6b5023d9cce3e108f3e`	SHA-256; 103 rows; --btl-labels

Rule glossary

Each rule in this review, in plain words: what it detects, the fraud type it guards against, when it fires, where it comes from, and the data it needs.

tp_ffiec_fan_in_5_senders_5d `Rule ID: tp_ffiec_fan_in_5_senders_5d`

What it detects	No description supplied by the client
Fraud type it guards against	Not stated
When it fires	Not stated
Source	client
Data fields it needs	Unknown

tp_u21_fan_out_5_benef_5d `Rule ID: tp_u21_fan_out_5_benef_5d`

What it detects	No description supplied by the client
Fraud type it guards against	Not stated
When it fires	Not stated
Source	client
Data fields it needs	Unknown

tp_u21_large_txn_9k `Rule ID: tp_u21_large_txn_9k`

What it detects	No description supplied by the client
Fraud type it guards against	Not stated
When it fires	Not stated
Source	client
Data fields it needs	Unknown

tp_u21_transfer_over_500 `Rule ID: tp_u21_transfer_over_500`

What it detects	No description supplied by the client
Fraud type it guards against	Not stated
When it fires	Not stated
Source	client
Data fields it needs	Unknown

tp_u21_wire_count_gt2_7d `Rule ID: tp_u21_wire_count_gt2_7d`

What it detects	No description supplied by the client
Fraud type it guards against	Not stated
When it fires	Not stated
Source	client
Data fields it needs	Unknown

tp_u21_wire_total_gt4999_7d `Rule ID: tp_u21_wire_total_gt4999_7d`

What it detects	No description supplied by the client
Fraud type it guards against	Not stated
When it fires	Not stated
Source	client
Data fields it needs	Unknown

Fraud types in plain words

Each fraud type named in your labels, in one sentence. The word in small grey text is the label as your file gives it.

Many into one (fan-in) `FAN-IN`	Many accounts send money into one account, which collects it.
One out to many (fan-out) `FAN-OUT`	One account sends money out to many accounts, so it spreads thin.
Type not given `no type`	Fraud labels in your file that do not say which kind of fraud it was.