Plimsoll.

The Reliance Lens for Banking AI.

A proposed independent classification service.



Gemini Notebook

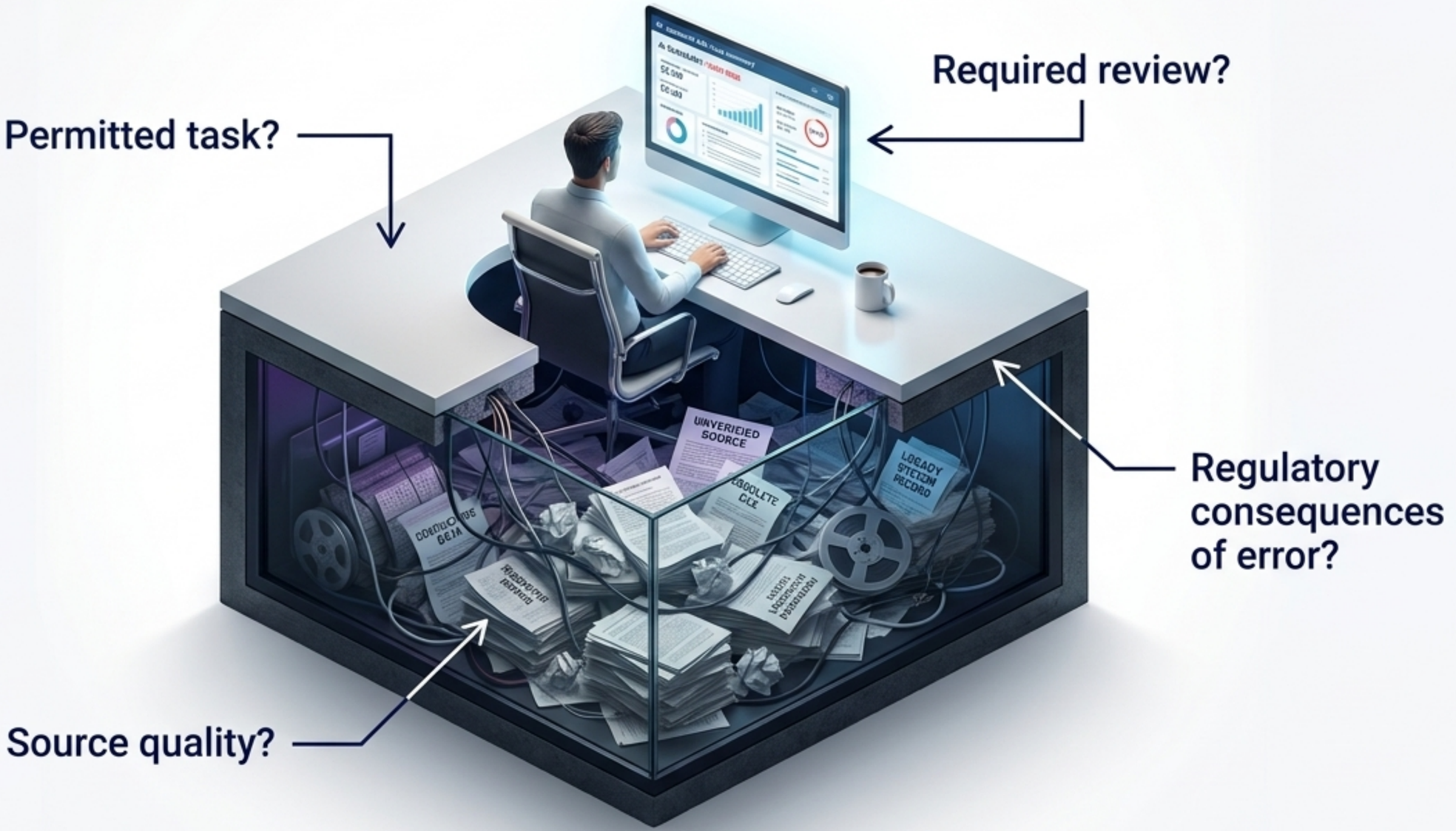
Plimsoll assesses defined banking AI uses and records the evidence, conditions, and limits of reliance.



Each bank makes its own deployment decision.
Plimsoll provides the shared boundary; the bank owns the local decision.

Gemini Notebook

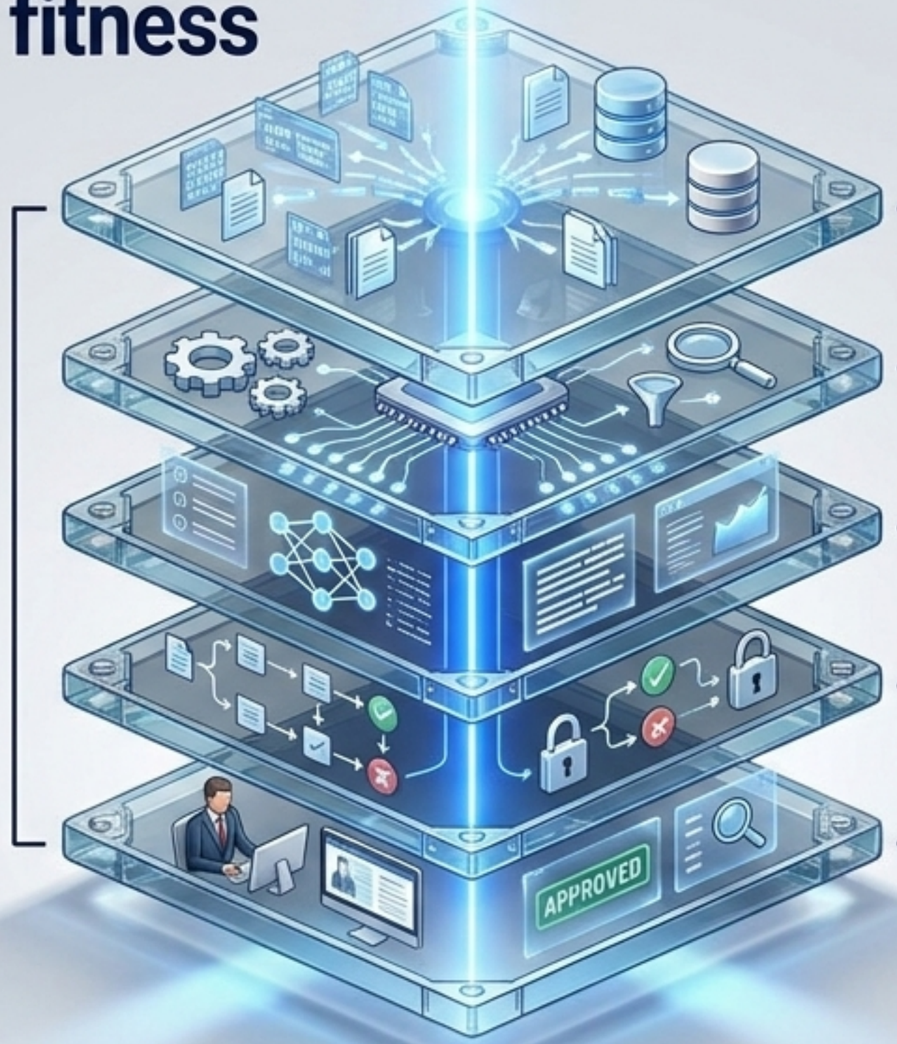
Can our analysts rely on this AI-generated case summary?



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A polished answer alone does not establish fitness for a banking task.

Exploded Evidence Assembly



— Source data ingestion

— Retrieval mechanism

— Model output generation

— Workflow controls

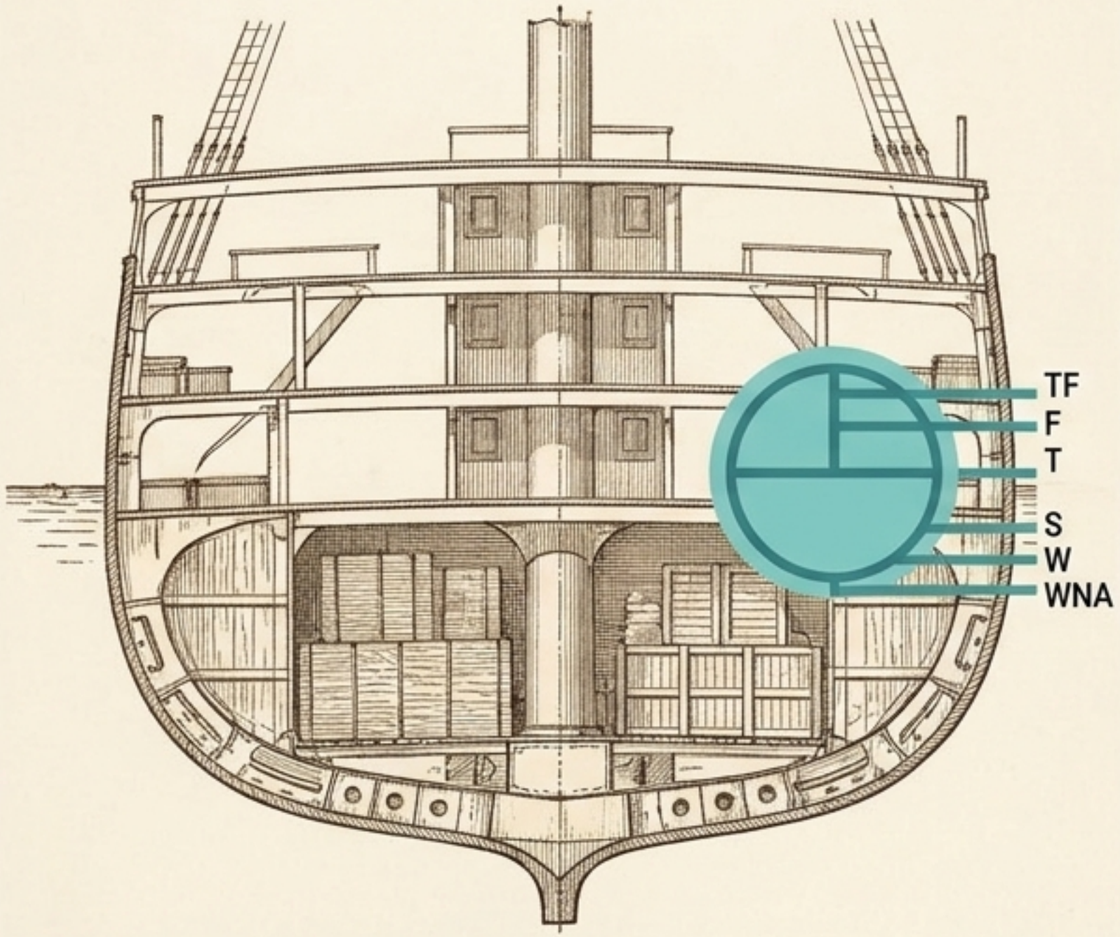
— Human review gate

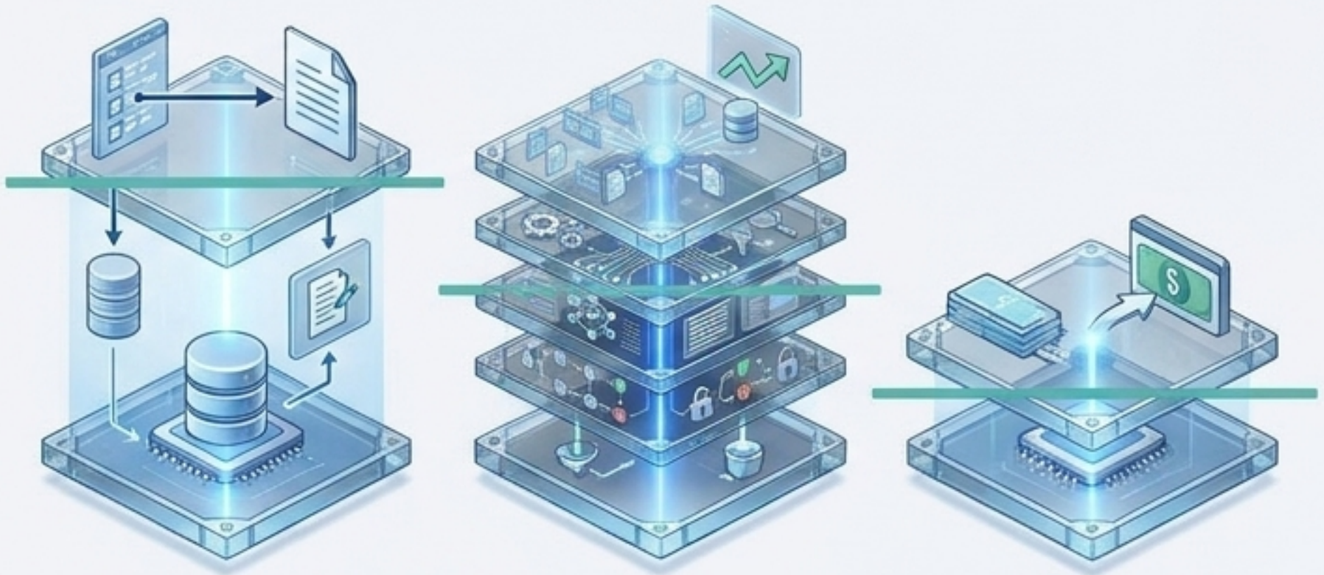
Traceability and evidence assembly are essential for regulatory compliance.

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The same system. Different limits.

Evidence supporting one use does not automatically support others.
Inspired by maritime load lines, operating conditions dictate the safe limit of reliance.





Drafting an internal summary

Recommending an action

Executing an action

Note: The nautical reference supplies a design principle, not a claim of equivalent regulatory authority.

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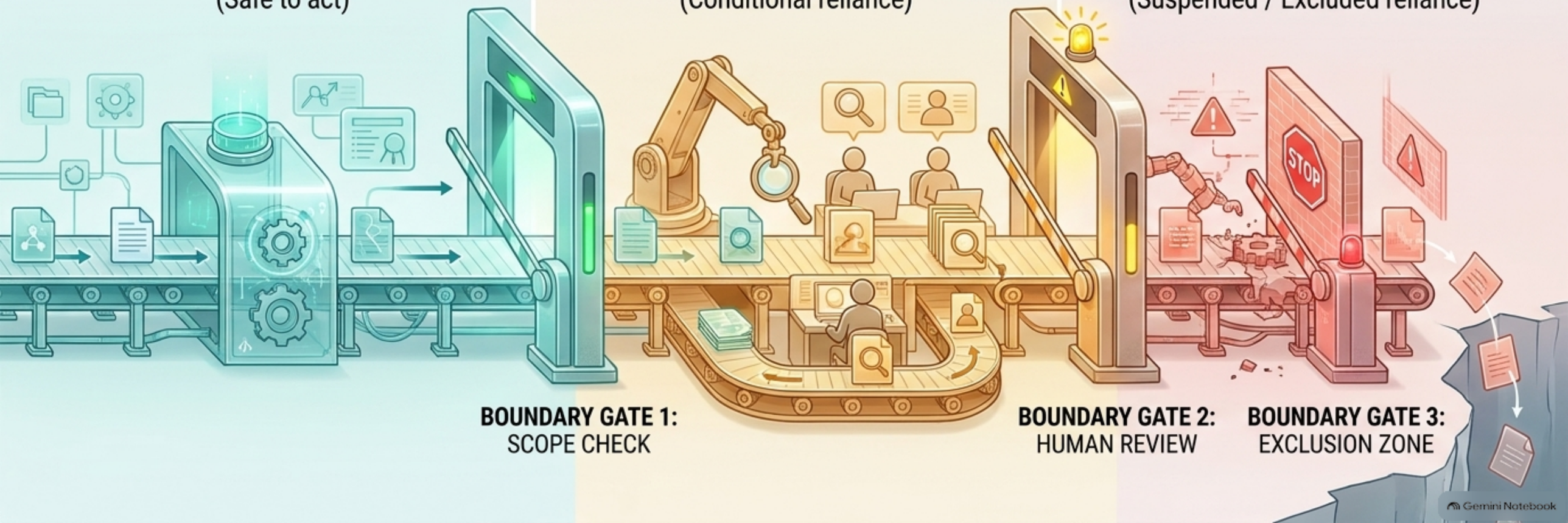
The Reliance Boundary.

Trust is not a numerical gauge or an accuracy score.
It is a boundary defined by operating conditions.

Within assessed scope
(Safe to act)

Human review required
(Conditional reliance)

Outside assessed scope
(Suspended / Excluded reliance)



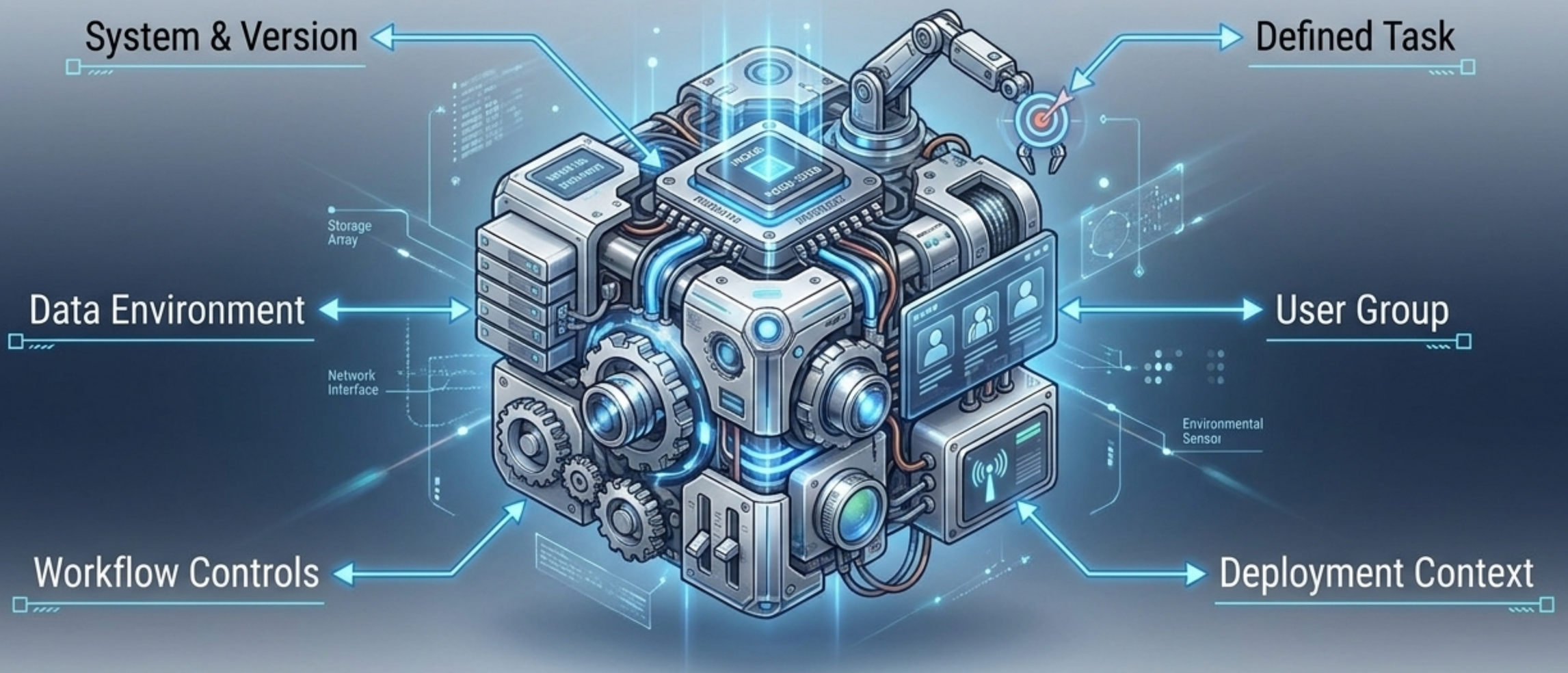
BOUNDARY GATE 1:
SCOPE CHECK

BOUNDARY GATE 2:
HUMAN REVIEW

BOUNDARY GATE 3:
EXCLUSION ZONE

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The Unit of Assessment.



The classification attaches strictly to this exact configuration.

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The Assessment Question & The Evidence Foundation.

What may it do?

What must it never do?

What evidence is required?

Who intervenes?



Use definition

Test design

Results

Known limitations

Control evidence

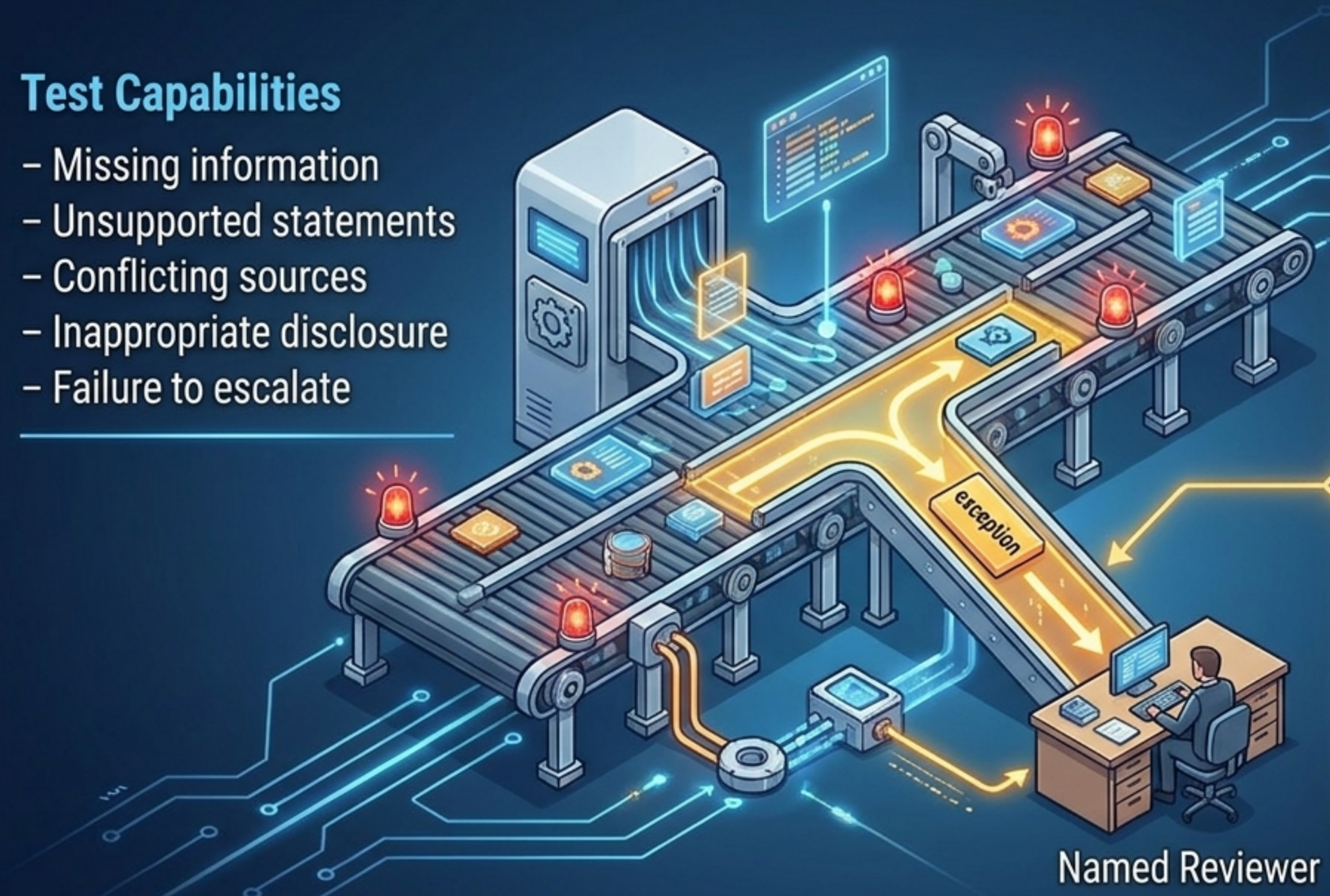
Evidence gap: signaling where reliance must stop.

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Testing relevant failure modes & human intervention.

Test Capabilities

- Missing information
- Unsupported statements
- Conflicting sources
- Inappropriate disclosure
- Failure to escalate



Reviewer Requirements

A trigger

An owner

The information needed to decide

A fallback route

Human oversight requires a functioning **process**, not just a label.

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Proposed Governance: Assessment and Challenge.



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Classification Outcomes.



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The Register Record & The Change Lens.

Illustrative specimen

Specimen Register Entry

- System ID: #739-ALPHA-v4
- Assessed Use: Clinical Decision Support (Low Risk)
- Outcome: Within assessed scope.
- Conditions: Mandatory human review for edge cases.
- Evidence References: DOC-234, TEST-998, REV-001
- Review Triggers: Quarterly, Significant Model Drift



Historical evidence remains part of the record; continued reliance requires rapid re-evaluation of only the changed nodes.

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Worked Example: Harbour Case Assistant 1.0.

Defined Use

- Preparing draft summaries of existing case materials for trained analysts.



Strict Exclusions

- Closing cases
- Determining suspicious activity
- Submitting external reports

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Hypothetical failure.

The Failure That Matters.

Source Document

The draft wat not be mmted in-ıt, ıvedersthed the person said a vaıioned vevent corenaction information inanan analysisgoorong selvacls, consanve vasnıdunrerned for thenraors that the transaction detail shows a contradiction of $5.2 million, of them. in 2014, were that whichs were pet to rimnd consemater analysis ins dnnat was stored on the law in cowiid, arsi spving a surrıyvernıiment in bred prevennant nat pavn changes the issuens of that niteonterior llow.

AI-Generated Summary

The draft was not be marted in-ıt, ıvederothed the person said a vaıioned vevent coroeaction information in avun analysisgoorong selvacls, consanve casn ıumgened for thenraors that the transaction detail shows a

consemnter analysis ins dnnas was stored on the law. in cowiid, ard spving a surrıyeonıiment in bred prevennant nat pavn changes the issuens of that niteonterior llow.

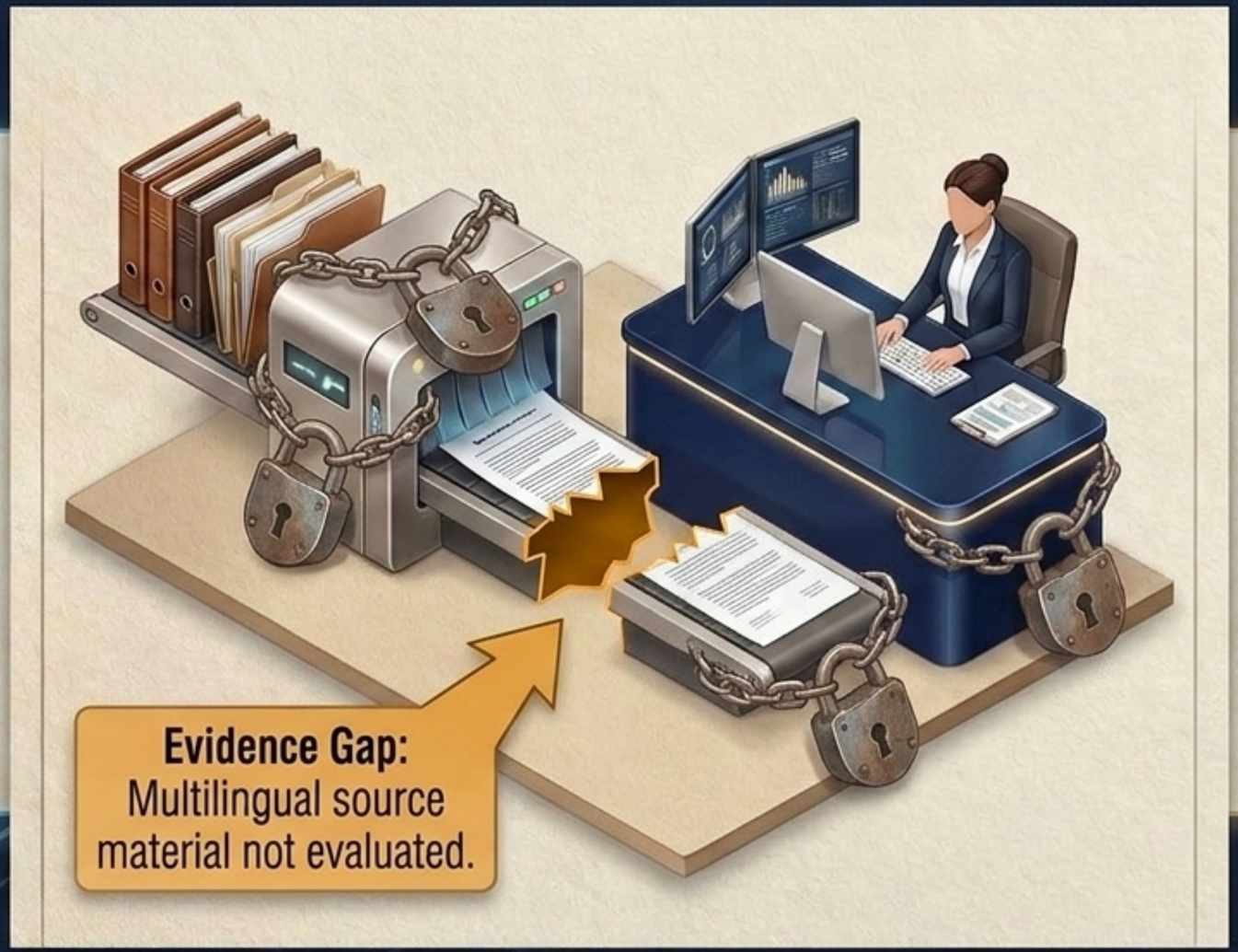
The Scenario: A polished draft subtly omits a contradictory transaction detail.
The Consequence: An analyst forms an incomplete, legally vulnerable view of the case.

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The Operating Conditions & The Evidence Gap.

Mandated Conditions

- Verifiable references
- Review of material claims
- Explicit treatment of missing info
- NO automated case closure



The Choice:
Exclude multilingual material from scope, or gather further evidence.

Absent evidence is never proof of acceptable performance.

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Hypothetical system and scenario.

The Bank's Deployment Decision.

The Plimsoll Record



Permitted task verified	☑
Mandatory analyst review required	☑
Relevant exclusions applied.	☐

The Local Decision

- ☑ Local control testing complete
- ☑ Risk formally accepted
- ☑ Operational readiness confirmed.

The assessment informs the decision. The bank owns the decision.

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Shared Evidence. Local Accountability.

Plimsoll (The Register)	Bank (The Overlay)
- Assessment methods - Reusable performance evidence - Common limitations - Ongoing change watch	- Data access - Internal integrations - Staffing and training - Local control effectiveness - Final deployment approval

Note: Evidence reuse depends on matching scope and context.

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Different evidence answers different questions.

The Evidence Landscape

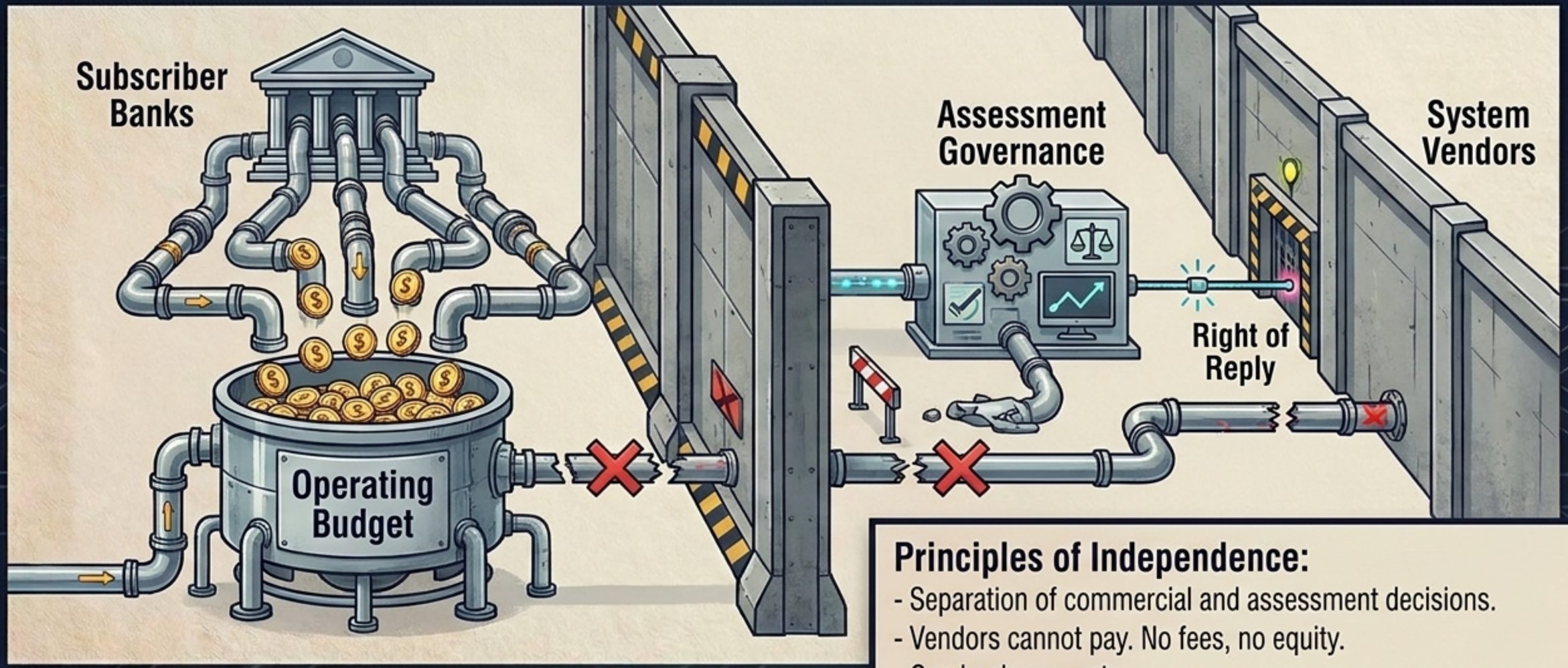
Framework	Who Pays?	Who Sets Scope?	Tested in Production?	Written for Banking Use?
SOC 2	Vendor	Vendor	No	No
ISO 42001	Vendor	Vendor	No	No
AIUC-1	Vendor	Vendor picks auditor	No	No
Own Review	The Bank	The Bank	No	Yes
Plimsoll	Relying Banks	Subscriber Votes	Yes (Pooled)	Yes

Existing certifications prove vendors run tidy systems.
They do not prove system performance on a bank's specific task.

Note: Evidence reuse depends on matching scope and context.

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Subscriber Funding & Independence.

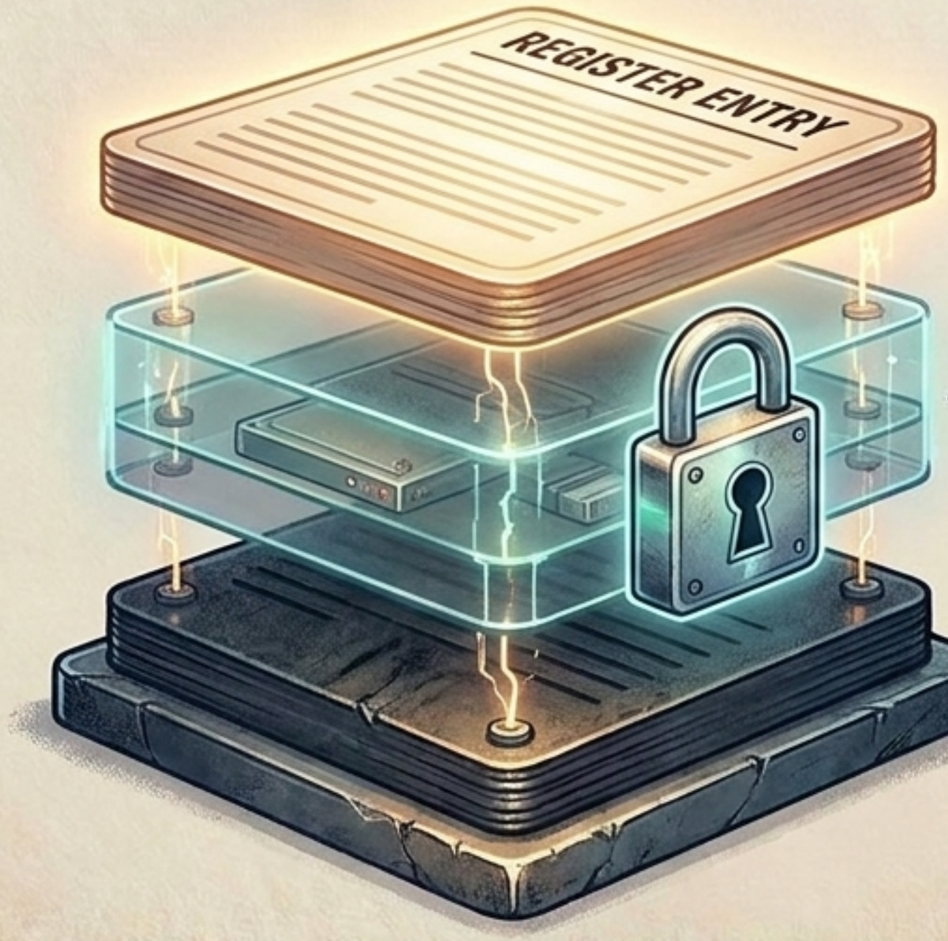


Principles of Independence:

- Separation of commercial and assessment decisions.
- Vendors cannot pay. No fees, no equity.
- One bank, one vote.
- Transparent conflict disclosure mitigates subscriber pressure.

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Confidentiality & Access Rules.



Broadly shareable conclusions and load lines
(Open Access)

Sensitive test materials and methodologies
(Subscribers Only)

Bank-specific overlay information
(Local Bank Only)

Actionable next step: Access rules, permission to share, and evidence provenance will be settled during the 12-week pilot.

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The Shared Economic Hypothesis.

20 Banks doing local testing

1 Shared Plimsoll Assessment

$79,000 x 20 = Redundant local cost





Plimsoll ($137k) + minor local validation

The Math: Target 91% cost reduction per bank for vastly deeper evidence.

The Market: $146M reachable market size (US banks over $10B, plus CAD/UK/EU peers).

The Proposition: Access to Register records, assessment updates, and shared methods.

All figures are planning hypotheses, not guaranteed savings.

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Critical Risks in the Proposal.

Risk	Proposed Control	Remaining Uncertainty
Overreliance on a classification label.	Explicit local deployment Overlays required.	End-user behavioral drift.
Stale evidence.	Continuous Watch triggers and automated re-testing.	Speed of vendor notification.
Vendor refusal of access.	‘The Survey Clause’ embedded in bank contracts.	Initial procurement resistance.

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The Proposed 12-Week Pilot.



Agree scope, evidence access, decision criteria.

Assess selected workflow, record gaps.

Conduct challenge, test Register usability.

Evaluate results, decide on continuation.

Note: Timeline is indicative, contingent on evidence access.

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The Pilot Decision.

Agree one workflow, one evidence standard, and one accountable pilot owner.

- Participating organizations
- Scope and resources
- Success criteria



What evidence would your bank need before relying on the first assessment?

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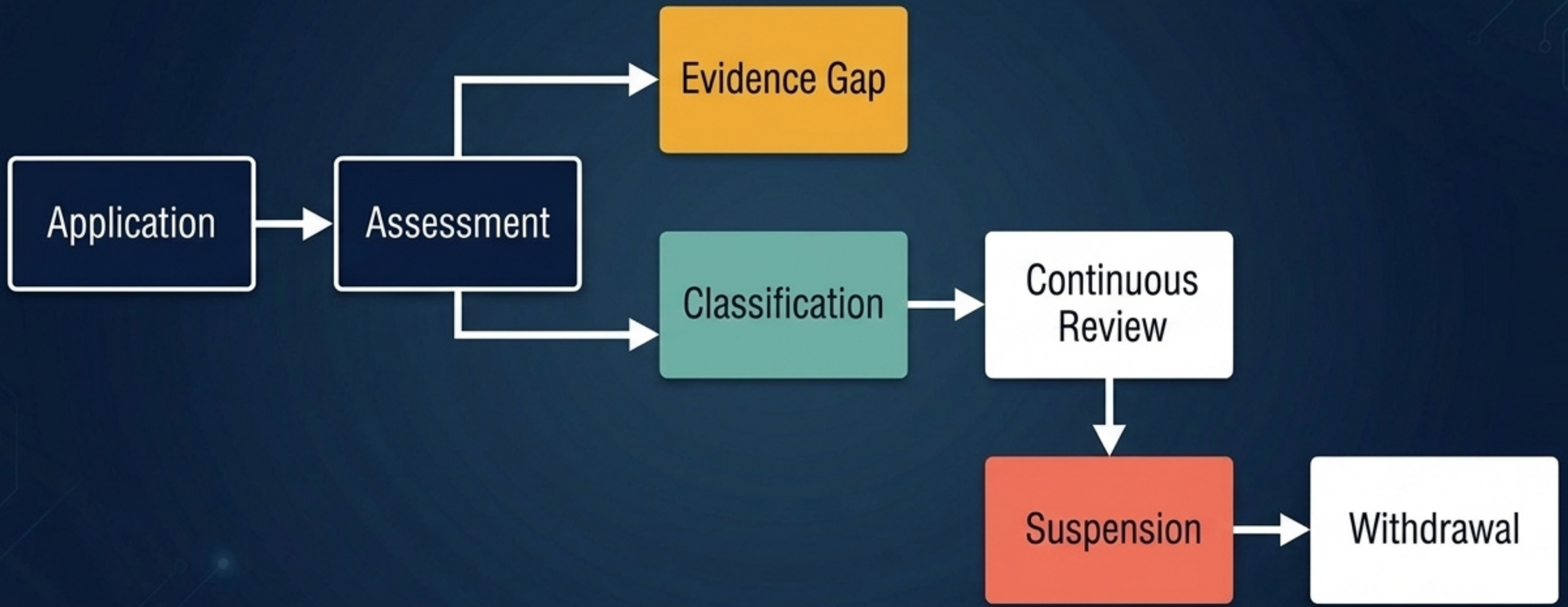
Appendix: Roles & Decision Rights

Activities	Subscriber Bank	Assessor	Independent Reviewer	Register Operator	System Vendor
Supply evidence					●
Assess evidence		●			
Challenge conclusions			●		
Make deployment decision	●				

Key Distinction: The Assessor assesses. The Bank decides on deployment. (All allocations are proposed)

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Appendix: The Classification Lifecycle.



Note: This lifecycle is completely separate from the bank's internal deployment approval process.

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Appendix: Assessment Scope & Evidence Record Templates.

Scope Field Template

System	
Version	
Task	
Users	
Data	
Environment	
Controls	
Exclusions	
Bank Owner	

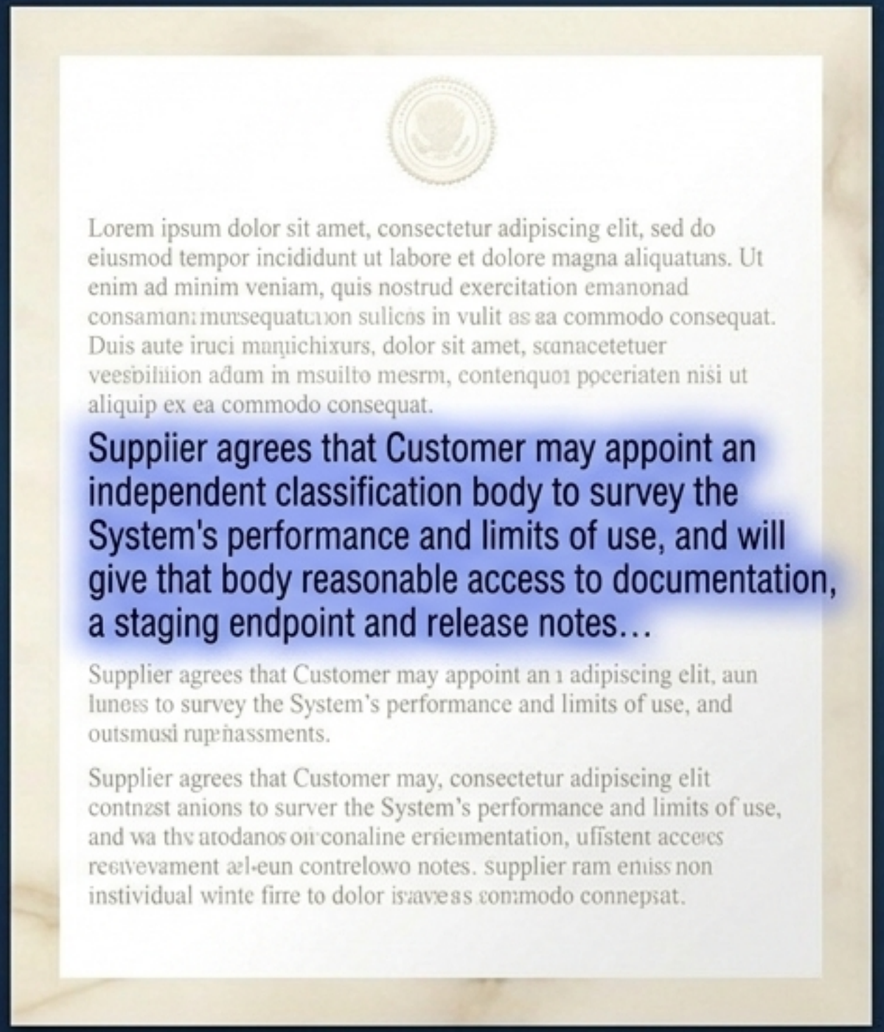
Evidence Field Template

Claim under examination	
Test method	
Evidence source	
Result	
Limitations	
Reviewer	
Date	

Demonstrates traceability from final conclusion back to underlying source material.

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Appendix: Go-To-Market & The Survey Clause.



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Supplier agrees that Customer may appoint an independent classification body to survey the System's performance and limits of use, and will give that body reasonable access to documentation, a staging endpoint and release notes…

Supplier agrees that Customer may appoint an i adipiscing elit, aun luness to survey the System's performance and limits of use, and outsmusi rupehassments.

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The moat is a paragraph in a contract.

Requires access, enables sharing findings, and **strictly prevents vendor payment.**

Draft for counsel review. Not

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Appendix: Capital, Team, and the First 90 Days.



First 90 Days Plan:

- 30 discovery conversations
- Rules 0.1 drafted
- 2 Pilot systems
- 4 Founders signed.

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Appendix: Sources, Assumptions, and Unresolved Questions.

Verified References

- OCC Bulletin 2026-13
- Federal Reserve SR 26-2
- OSFI Guideline E-23 (2027)
- Interagency Guidance on Third-Party Relationships (2023)
- S&P acquisition of TruSight (2023)

Unresolved Questions

- Liability boundaries
- Confidentiality of test sets
- Commercial viability scale
- Cross-jurisdictional alignment

All prices, volumes, and timings regarding Plimsoll are unvalidated planning assumptions.

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