



Request for Reevaluation of Public Comment Period on Remaining CFPB RFIs

Submitted by mlongacre@csbs.org on Mon, 06/04/2018 - 11:09

June 4th, 2018

Monica Jackson, Office of the Executive Secretary
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC

Re: Request for Reevaluation of Public Comment Period on Remaining CFPB RFIs

Dear Ms. Jackson,

The Conference of State Bank Supervisors ("CSBS") appreciates the opportunity to comment on the Consumer Financial Protection Bureau's ("CFPB" or "Bureau") series of twelve Requests for Information ("RFIs") on the Bureau's various statutory functions. To date, CSBS has provided comments on the Civil Investigative Demands, Enforcement Processes, Supervision Program, and Consumer Complaint Reporting RFIs.

CSBS respectfully requests that the Bureau provide for a single due date for the remaining RFIs that would enable state regulators and other stakeholders to thoroughly consider and craft appropriate responses on each topic. Specifically, CSBS requests that the single due date for submitting responses to all remaining RFIs be set as October 16th, which is 90 days after the current due date of the twelfth RFI. Alternatively, we would request that the Bureau space out the existing comment deadlines so that each is separated by at least two weeks.

The majority of the remaining RFI topics, including rulemaking processes, adopted regulations, and inherited regulations, among other topics, are broad in scope. The RFIs were released in quick succession and the comment deadlines for each topic fall approximately a week apart, with the deadlines on two topics (Public Reporting Practices of Consumer Complaint Information and Rulemaking Processes) separated by a mere four days.

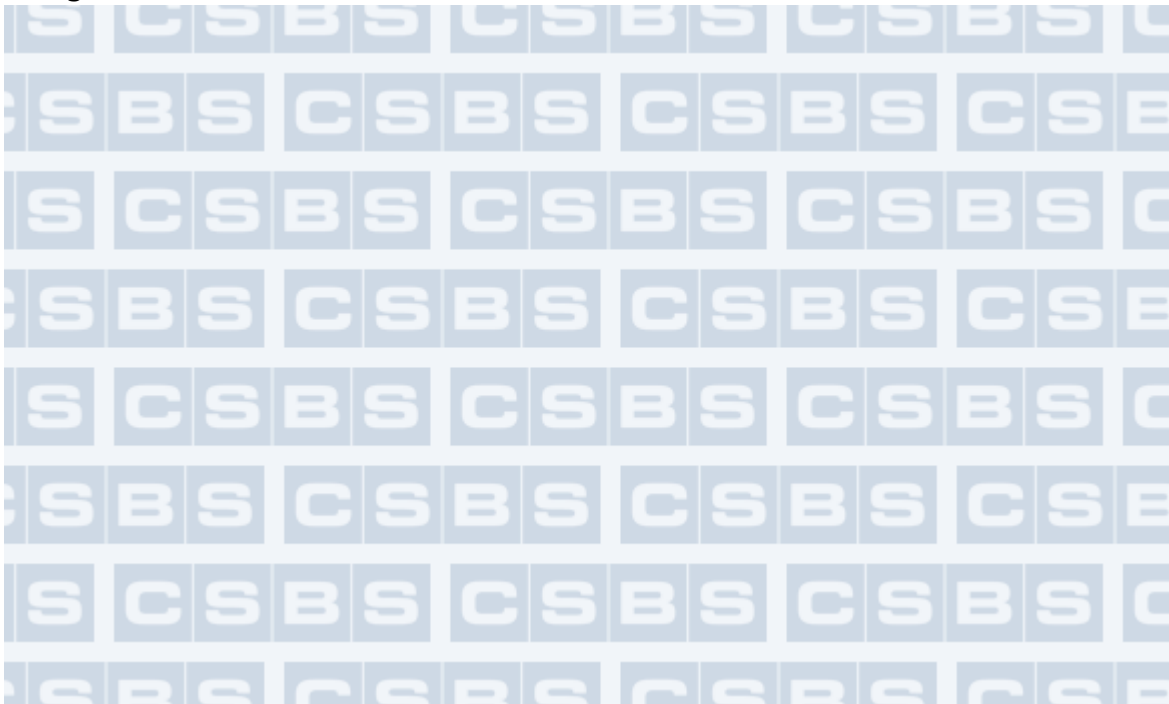
When commenting on policy proposals or requests for information, CSBS engages in a policy development process to brief and gather input from policy-setting committees comprised of state regulators and reach consensus-based decisions regarding policy positions adopted by CSBS. This is a methodical and deliberative policy development process designed to ensure that any policy positions adopted or viewpoints expressed accurately reflect the voice of state financial services regulators. Accordingly, providing feedback on each of the Bureau's RFIs is a significant undertaking, and the staggered and closely grouped deadlines may not allow stakeholders sufficient time to provide substantive input in response to the questions posed in each RFI.

Recently, Acting Director Mulvaney noted his surprise at the limited volume of comments received on several RFIs. Director Mulvaney stated that one RFI had drawn only a single comment in the period since its release. It is likely that stakeholders who are focused on individual topics would provide comments on additional topics if they had more time to do so. Providing an extended timeline to respond to the remaining RFIs would therefore contribute to greater participation in the Bureau's collection of evidence.

Sincerely,

John Ryan
President & CEO

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