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June 15, 2018

Comment Intake
Bureau of Consumer Financial Protection
1700 G Street, NW
Washington, DC 20552

Re: Request for Information Regarding the Bureau’s Adopted Regulations and New Rulemaking Authorities, Docket No. CFPB-2018-0011

To Whom It May Concern:

On behalf of America’s credit unions, I am writing in response to the Bureau of Consumer Financial Protection’s (Bureau) Request for Information (RFI) Regarding the Bureau’s Adopted Regulations and New Rulemaking Authorities. The Credit Union National Association (CUNA) represents America’s credit unions and their 110 million members.

The Bureau is seeking comments and information from interested parties to assist it in considering whether, consistent with its statutory authority to prescribe rules pursuant to the Federal consumer financial laws, it should amend those rules it has promulgated since its creation or issue certain new rules.

As CUNA’s submission to this RFI, please find the attached CUNA white paper, CUNA’s Common-Sense Reforms to Bureau of Consumer Financial Protection Rules and Procedures. This CUNA white paper provides comments and feedback on Bureau rulemakings as well as on several subsequent RFIs published by the Bureau this year. We hope the Bureau implements CUNA’s recommendations as it moves forward with its structural, functional, and operational changes.

If you have questions or would like to discuss CUNA’s white paper further, please contact me at 202-508-6736. On behalf of America’s credit unions and their 110 million members, thank you for your consideration.

Respectfully submitted,

Elizabeth A. Eurgubian
Deputy Chief Advocacy Officer & Senior Counsel

Attachment