



July 21, 2025

Anthony May
PRA Office
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20552

Via Regulations.gov

Re: CFPB Consumer Complaint Intake System Company Portal Boarding Form, Docket No. CFPB-2025-0027; OMB Control No. 3170-0054

To Whom it May Concern:

Community Legal Services of Philadelphia (CLS), on behalf of its low-income clients, submits this comment in response to the Consumer Financial Protection Bureau's (CFPB) notice and request for comment on the CFPB's consumer complaint intake system and company portal. These systems serve an essential function by giving consumers an accessible, effective channel for resolving financial disputes and by enabling the CFPB and others to identify patterns of harm in the marketplace.

I. CLS offers this letter based on our experience representing thousands of low-income consumers.

CLS provides free civil legal assistance to approximately 10,000 Philadelphians each year. Our clients often face serious barriers to resolving financial problems, including abusive debt collection practices, loan servicing breakdowns, and fraud. The CFPB complaint process plays a central role in our ability to help clients resolve these issues quickly, often before litigation or enforcement becomes necessary.

II. The CFPB complaint system delivers results and supports broader transparency.

The CFPB complaint database is a critical public resource that captures detailed consumer experiences across financial products. Its narrative format provides context that is otherwise unavailable through aggregate data. The database helps identify emerging issues early, so they can be addressed before they affect more people.

For consumers, the complaint portal provides an efficient, no-cost path to resolution, particularly when companies do not respond to phone calls or written disputes. In our experience, the process often leads to refunds, accounting corrections, and resolution of longstanding issues.



III. CLS clients regularly benefit from the CFPB complaint process.

Many of our clients have achieved real and timely relief by using the CFPB portal, including:

- Ms. L, a 96-year-old homeowner, who hired Roto-Rooter for emergency plumbing repairs and paid in full. She was stunned to later receive a \$12,500 bill from Synchrony Bank, which claimed she had financed a second job she never approved. When Ms. L disputed the charge, Roto-Rooter refused to provide documentation or cooperate with an investigation. She first sent a dispute letter to Synchrony, but after receiving no adequate response, she filed a CFPB complaint. Only then did Synchrony close the account and eliminate the debt.
- Ms. F who received a foreclosure notice from her mortgage servicer, SPS, claiming she had missed payments, even though she had paid on time. In reality, SPS had misapplied her payments and added improper fees. While her CLS advocate prepared a formal dispute letter, Ms. F submitted a complaint through the CFPB. By the time SPS responded to the formal dispute, the issue had already been resolved. SPS specifically acknowledged that it corrected the error because of her CFPB complaint.
- Ms. U who fell behind on her mortgage while on leave to care for her mother. After returning to work, she applied for loss mitigation with Freedom Mortgage, seeking a partial claim to reinstate the loan. Freedom wrongly denied her application, claiming that a water lien on the property disqualified her, despite the fact that the lien had already been vacated by the City of Philadelphia. Although Ms. U tried to explain this, Freedom refused to reconsider and filed a foreclosure action. CLS submitted a formal letter and filed a CFPB complaint explaining the error. In response to the complaint, Freedom acknowledged its mistake, withdrew the foreclosure, corrected Ms. U's credit report, and removed all foreclosure-related fees.

Even when an individual complaint does not result in a favorable outcome for our client, the process is still worthwhile. By documenting their experiences, our clients contribute to identifying widespread problems. In several cases, we have seen CFPB investigations or policy changes that aligned closely with issues first raised through individual complaints:

- For example, CLS has assisted multiple clients in filing complaints against Comerica for failing to investigate unauthorized charges on the Direct Express card. While not all of these complaints were resolved favorably, they contributed to a broader understanding by the CFPB and the Treasury Department of systemic failures by the bank to comply with the Electronic Funds Transfer Act, ultimately helping to spur an enforcement action.

These are just a few examples of how the system works as intended by resolving problems efficiently and helping people regain financial stability.

IV. The information collection is efficient, necessary, and minimally burdensome.



The CFPB's complaint process is structured to be accessible for consumers and efficient for the agency's supervisory and enforcement responsibilities. For CLS, it is an essential tool that complements our casework and helps us protect our clients.

We urge the CFPB to continue onboarding companies into the portal and to maintain full public access to complaint narratives and outcome data. These features enhance transparency, help consumers make informed decisions, and ensure fairness in the marketplace.

Respectfully submitted on behalf of the low-income clients of Community Legal Services of Philadelphia,

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