

August 1, 2011

Robert Dahl
PRA Clearance Officer
Department of the Treasury, Room 11000,
1750 Pennsylvania Avenue, NW.,
Washington, DC 20220

Shagufta Ahmed
OMB Reviewer
Office of Management and Budget
New Executive Office Building, Room 10235,
Washington, DC 20503

Re: Consumer Financial Protection Bureau Consumer Response Intake Fields (76 FR 38458)

Dear Sir or Madam,

The American Bankers Association submits this comment on behalf of its membership that represents banks of all sizes and charters (with a majority of members holding less than \$165 million in assets) and is the voice for the nation's \$13 trillion banking industry and its two million employees.

We continue to have significant reservations that the consumer response process and the forms associated with it are in a continuing state of flux that should not receive anything but conditional approval. From inapt phrasing to uncertain standards for access, the information collection that is represented by this process is seriously deficient for such an important undertaking. As noted in our letter to Associate Director Catherine West dated July 20, 2011, there are many components of the intake form that warrant improvement. The consumer response process being launched by the Bureau of Consumer Financial Protection is both incomplete in its coverage of the scope of complaints that is at the core of the Bureau's mission and over-inclusive in its effort to encompass feedback and inquiries that the Bureau is not staffed to manage at this point in time. In addition, it may be beyond the functions the Bureau is authorized to undertake without an appointed Director.

ABA is prepared to constructively engage with the Bureau (and by necessity with the prudential regulators and other government agencies) to realize a process that conforms to the Bureau's mission in step with its authorities and resources as they become available. Consumer responsiveness is a priority for ABA members, and we fear that the unfinished transition of complaint handling will prejudice customers and bankers. Accordingly, information collected during this transition should be narrowly held for the purpose of addressing individual complaint resolution. It should not be considered a source for analysis, reporting or sharing outside the Bureau's or prudential regulators' own supervisory purposes because the form of questions, content and reliability of information gathered and the interaction of all parties in handling this process are not finally settled.

Consequently ABA strongly urges the Office of Information and Regulatory Affairs of the Office of Management and Budget to withhold general approval for this information collection until the response process design is completed and a final submission is made by the Bureau accompanied by an Inspector General's opinion of authority for the powers exercised.

Respectfully submitted,



Richard R. Riese
Senior Vice President