



Credit Union National Association

cuna.org

601 Pennsylvania Ave., NW | South Building, Suite 600 | Washington, DC 20004-2601 | **PHONE:** 202-638-5777 | **FAX:** 202-638-7734

Submitted via <http://www.regulations.gov>

June 19, 2012

Consumer Financial Protection Bureau (CFPB)
Attention: PRA Office
1700 G Street NW
Washington, DC 20552

Ms. Shagufta Ahmed
Office of Management and Budget (OMB)
New Executive Office Building
Room 10235
Washington, DC 20503

Re: Collection of Information – Compliance Costs and Other Effects of Regulations

Dear PRA Office (CFPB) and Ms. Ahmed (OMB):

This comment letter represents the views of the Credit Union National Association (CUNA) regarding the Consumer Financial Protection Bureau's (CFPB's) notice of the agency's plans to collect information on compliance costs and other effects of its potential new regulations, including those required under the Dodd-Frank Act. This notice has been submitted to the Office of Management and Budget (OMB) for review and approval. By way of background, CUNA is the largest credit union advocacy organization in this country, representing approximately 90% of our nation's 7,200 state and federal credit unions, which serve about 95 million members.

CUNA believes the CFPB should fully understand and minimize the potential implementation and ongoing compliance costs and unintended consequences on credit unions from its potential new regulations. Because this information collection regarding compliance costs will also impose costs and burdens, we urge the CFPB to minimize such costs and burdens associated with this information collection by using limited, targeted questions, as well as efficient information collection methods.

We strongly urge the CFPB to consider the high potential compliance costs and other effects on credit unions, especially smaller credit unions,



OFFICES: | WASHINGTON, D.C. | MADISON, WISCONSIN

with regard to the agency's proposed mortgage, remittance transfer, and other regulations.

We would be pleased to provide more detailed comments and feedback from credit unions if the CFPB would provide greater specificity on this information collection request. Also, we welcome further opportunity to discuss with the CFPB efficient methods to collect information regarding compliance costs from credit unions.

The CFPB should fully understand the potential impact of its regulatory changes on a financial institution's per unit cost of delivering financial services, the overall compliance costs for the institution, any other effects, and unintended consequences. We believe relevant compliance cost information should include quantitative data, qualitative information, anticipated costs, and estimated ranges of costs.

As the agency is aware, a number of Federal laws require the CFPB to consider the benefits, costs, and impacts of its rulemaking actions, including the Regulatory Flexibility Act and Paperwork Reduction Act. Section 1022(b)(2)(A) of the Dodd-Frank Act also requires the agency to consider costs and benefits of rules to financial providers and consumers, including consumers in rural areas and credit unions and other depository institutions with total assets of \$10 billion or less.

While the CFPB estimates that responding to the proposed information collection requests may take up to 90 minutes per response, we believe respondents will have to spend much more time to understand and research the potential regulatory changes and the numerous areas that may be affected at their institution and at third-parties they may use, as well as coordinating a response to agency. To minimize costs for respondents, the CFPB should develop limited, targeted questions, and provide additional resources to assist respondents with this information collection.

The CFPB plans to collect information on compliance costs using structured interviews, focus groups, conference calls, written questionnaires, and online surveys. The agency should be transparent and provide the details and results on the information collection, survey questions, and methodology.

Further, sampling institutions that are representative of the markets that may be affected by the CFPB rulemakings can be more efficient than broader inquiries. The agency should utilize proper statistical and research methods to ensure a representative sample for each affected market to properly measure compliance costs. Other institutions that are not part of the sample should have an option to submit their information after reviewing the information collection materials.

Thank you for the opportunity to comment on the information collection notice. If you have any questions concerning our letter, please feel free to contact Senior Vice President and Deputy General Counsel Mary Dunn or me at (202) 508-6733.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Tsang". The signature is fluid and cursive, with the first name "Dennis" and last name "Tsang" clearly distinguishable.

Dennis Tsang
CUNA Regulatory Counsel