



Credit Union National Association

cuna.org

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August 2, 2013

Ms. Monica Jackson  
Office of the Executive Secretary  
Consumer Financial Protection Bureau  
1700 G Street NW  
Washington, DC 20552

Re: Comments on CFPB's Request for OMB Approval – Telephone Survey  
Exploring Consumer Awareness and Perceptions Regarding Dispute  
Resolution Provisions in Credit Card Agreements;  
Docket No: CFPB–2013–0016

Dear Ms. Jackson:

The Credit Union National Association (CUNA) appreciates the opportunity to submit comments regarding the Consumer Financial Protection Bureau's (CFPB) request for approval by the Office of Management and Budget (OMB) for a telephone survey on consumer awareness and perceptions of dispute resolution provisions in credit card agreements. By way of background, CUNA is the country's largest credit union trade organization, representing our nation's state and federal credit unions, which serve nearly 97 million members.

The CFPB is requesting approval from the OMB to conduct a telephone survey of 1,000 consumers regarding dispute resolution provisions in credit card agreements. This survey is in conjunction with the CFPB's study of pre-dispute arbitration agreements, as required by section 1028(a) of the Dodd-Frank Act. It is CUNA's understanding that, while most credit unions do not utilize pre-dispute arbitration agreements, a small number of credit unions may incorporate similar provisions into their consumer contracts.

CUNA commented on the CFPB's initial request for information regarding a study on pre-dispute arbitration agreements in July 2012. In our letter, CUNA recommended that the CFPB seek to determine consumers' understanding of dispute resolution, particularly arbitration, while at the same time requesting that the CFPB be cognizant of the tremendous regulatory burdens that credit unions are already facing.



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We appreciate that the CFPB has elected to follow our recommendation on determining consumers' understanding of dispute resolution provisions. Regardless of the exact content of the CFPB's survey and overall data gathering plan, we urge the agency to follow our latter recommendation as well and be mindful of the ever-increasing regulatory compliance challenges credit unions—particularly those of smaller asset size—are dealing with. CUNA requests that the CFPB take this into consideration and attempt to minimize the potential burden on credit unions as a result of this study.

While, at this time, we do not have any formal objections to a survey by the CFPB, we urge the agency to ensure it utilizes a sample size that is adequate to yield a sufficient number of informed respondents. Once proposed, we look forward to reviewing and commenting on the CFPB's draft survey.

Thank you for the opportunity to express our views on the CFPB's request for approval from the OMB to conduct a consumer survey on dispute resolution provisions in credit card agreements. If you have any questions about our comments, please do not hesitate to contact CUNA Deputy General Counsel Mary Dunn or me at (202) 508-6743.

Sincerely,

A handwritten signature in cursive script that reads "Luke Martone". The signature is written in dark ink and is positioned above the printed name and title.

Luke Martone  
Senior Assistant General Counsel