



May 9, 2011

Andrew Trueblood
Consumer Financial Protection Bureau Implementation Team
1801 L Street, NW
Washington, D.C. 20036

**RE: Comments on Consumer Financial Protection Bureau
Consumer Response Intake Fields**

Dear Mr. Trueblood:

The Ohio Credit Union League (OCUL) appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB) public request for comments complaint intake fields for consumer complaint form, as required by the Paperwork Reduction Act of 1995, Public Law 104-13(44 U.S.C. 3506(c)(2)(A)).

The Ohio Credit Union League is the trade association for credit unions in Ohio, advocating on behalf of Ohio's 390 federal and state-chartered credit unions and their 2.68 million members. Credit unions, as not-for-profit, member-owned cooperative financial depositories, provide quality products and services at a reasonable cost to their members. The comments reflected in this letter represent the recommendations and suggestions that OCUL believes would be in the best interest of their members as consumers and owners of their credit unions.

Summary and Analysis of the Proposed Notice

The CFPB issued this proposed notice, Consumer Response Intake Field, as required by Paperwork Reduction Act of 1995, Public Law 104-13(44 U.S.C. 3506(c)(2)(A)) as one of the responsibilities of the new CFPB to facilitate the centralized collection of, monitoring of, and response to consumer complaints regarding financial products and services. OCUL commends the CFPB for its efforts in determining issues of concern for consumers interacting with the financial service providers in the market place. However, it is important that the process does not become a burden on the credit unions and have a negative effect on their ability to offer quality products and services to their members at a reasonable cost.

Specifically, the CFPB is developing online and paper intake methods that will facilitate the centralized collection, monitoring, and response to consumer complaints concerning consumer financial products and services. The CFPB form that is being developed will collect information regarding:

- The type of contact (such as online, by phone, etc.);
- The substance of the complaint, question, or other issue;
- The consumer's contact information;
- Identifying information about the consumer or consumer's household; and
- Information about the incident and institution giving rise to the complaint, question, or request for other information.



Analysis

In reviewing this proposal, OCUL has three concerns and recommendations that it respectfully requests that the CFPB take under consideration.

First, under this proposal, consumer complaints will be directed to the CFPB and then back to the respective credit union or other financial institution. OCUL believes that this may very well increase efficiency in the process in that the CFPB would be diligent in the process and filter out those complaints that are without merit. It is important that the CFPB not function as a pass through to the credit unions to respond to each and every issue or complaint that is filed. By doing so, that would create an undue burden on the credit union and take away from the operations of the credit union itself to the detriment of their members. Therefore, OCUL respectfully recommends that each complaint be scrutinized and filtered before contacting the respective credit union or other financial institution. OCUL is concerned that inundating the credit union with every complaint or issue that arises would create an undue burden on the credit union.

Second, OCUL respectfully suggests that the CFPB include more fields on the form that will provide additional information on the complaint and the individual complaining as to the history of the complaints filed by an individual and any other actions with one or more institutions. It is important that there be balance between those issues with merit and those that are frivolous. While OCUL understands that the function of the CFPB is to address issues and problems faced by consumers, additional burdens placed on credit unions, and to an extent other financial institutions could have a negative effect on the credit union and their member owners.

Third, credit unions are unique in many ways in the marketplace. As not-for-profit, member-owned cooperative financial depositories, credit unions operate for their member owners and provide many services for the members' best interests. It is OCUL's understanding that credit unions receive only a minimal number of complaints and continue to address those issues brought to their attention with their members. Some credit unions also establish member volunteers to respond to other member complaints and concerns and work to resolve these issues.

Conclusion

Finally, the Ohio Credit Union League encourages the Consumer Financial Protection Bureau to adopt review and assessment procedures that strike a balance between complaints and inquiries that may be frivolous or without merit with those that have merit so as to not create an undue burden on the credit union. It is very important that the process be fair and equitable to all parties.

The Ohio Credit Union League would like to thank the Consumer Financial Protection Bureau for the opportunity to comment on this proposal and, appreciates consideration of these comments if any further actions or final rules are adopted. If you would like additional information or suggestions on this proposed notice, please do not hesitate to contact me at the Ohio Credit Union League at (800) 486-2917, ext. 266, or jkozlowski@ohiocul.org.

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Respectfully submitted,



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