



Network Branded Prepaid Card Association

10332 Main Street, Suite 312

Fairfax, VA 22030

202.548.7200

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Jean-Didier Gaina
US Department of Education
1990 K Street, NW, Room 8055
Washington, D.C. 20006

Re: Department of Education; Notice of Proposed Rulemaking
[Docket No. ED-2015-OPE-0020]

This letter is submitted to the Department of Education ("**DOE**") on behalf of the Network Branded Prepaid Card Association ("**NBPCA**")¹ in response to the Notice of Proposed Rulemaking published in the Federal Register on May 18, 2015 at 28484 (the "**Proposed Rule**"). The Proposed Rule seeks to modify the cash management regulations of the Higher Education Act of 1965 (the "**Act**") and contains numerous and substantial new requirements for prepaid account products offered to students in connection with the disbursement of funds under Title IV of the Act ("**Title IV Funds**"). The NBPCA is currently working with its members to review and comment on the issues raised by the Proposed Rule. By this letter, the NBPCA would like to request that the DOE extend the comment period for the Proposed Rule for an additional thirty (30) days.

The Proposed Rule raises many serious issues in connection with the issuance of prepaid products to students in connection with the disbursement of Title IV Funds. Given the breadth of matters addressed in the 296 page Proposed Rule, forty-five (45) days is simply not enough time for the NBPCA and its members to fully consider and respond to all of the issues raised in the Proposed Rule. Therefore, the NBPCA respectfully requests that the DOE extend the comment period for an additional thirty (30) days beyond the current July 2, 2015 deadline.

The NBPCA appreciates the opportunity to comment on this important subject and looks forward to working with the DOE to address the issues raised by the Proposed Rule and better meet the needs of students in connection with financial products and services.

¹ The NBPCA is a nonprofit, inter-industry trade association that supports the growth and success of network branded prepaid cards and represents the common interests of the many participants in this new and rapidly growing payments category. The NBPCA's members include banks and financial institutions, the major card networks, processors, program managers, marketing and incentive companies, card distributors, payment industry consultants and law firms.

Sincerely,



Brad Fauss
Interim Executive Director, NBPCA
(202) 548-7202



Brian Tate
VP, Government Relations, NBPCA
(202) 329-8938