

February 22, 2018

**VIA EMAIL AND U.S. MAIL**

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

**Re: Request for Information Regarding Bureau Civil Investigative Demands and Associated Processes (Docket No. CFPB-2018-0001); Request for Information Regarding Bureau Rules of Practice for Adjudication Proceedings (Docket No. CFPB-2018-0002); and Request for Information Regarding Bureau Enforcement Processes (Docket No. CFPB-2018-0003)**

Dear Ms. Jackson:

On behalf of the Financial Services Roundtable (Roundtable)<sup>1</sup> and Consumer Bankers Association (CBA)<sup>2</sup>, (collectively, the Associations) we are writing to request 30-day extensions of the comment periods for the Consumer Financial Protection Bureau's (CFPB or Bureau) requests for information regarding Bureau Civil Investigative Demands (CID) and Associated Processes,<sup>3</sup> Bureau Rules of Practice for Adjudication Proceedings,<sup>4</sup> and Bureau Enforcement Processes.<sup>5</sup>

The Roundtable and CBA support the Bureau's efforts to solicit public input to help the agency assess potential changes that can be implemented to the Bureau's CID processes, its Rules of Practice for Adjudication Proceedings, and its processes related to the enforcement of Federal consumer financial law. To this end, we believe the Bureau would benefit from a broad and comprehensive response by the public to the CFPB's requests for comment.

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<sup>1</sup> The Financial Services Roundtable represents the largest banking and payment companies financing the American economy. Member companies participate through the Chief Executive Officer (CEO) and other senior executives nominated by the CEO.

<sup>2</sup> The Consumer Bankers Association is the only national financial trade group focused exclusively on retail banking and personal financial services—banking services geared toward consumers and small businesses. As the recognized voice on retail banking issues, CBA provides leadership, education, research, and federal representation for its members. CBA members include the nation's largest bank holding companies as well as regional and super-community banks that collectively hold two-thirds of the total assets of depository institutions.

<sup>3</sup> Request for Information Regarding Bureau Civil Investigative Demands and Associated Processes, 83 Fed. Reg. 3686 (Jan. 26, 2018).

<sup>4</sup> Request for Information Regarding Bureau Rules of Practice for Adjudication Proceedings, 83 Fed. Reg. 5055 (Feb. 5, 2018).

<sup>5</sup> Request for Information Regarding Bureau Enforcement Processes, 83 Fed. Reg. 5999 (Feb. 12, 2018).

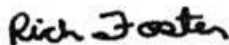
We believe, however, that the original 60-day comment periods do not provide sufficient time for the public to develop responses that will provide the Bureau the type of detail, information, and technical analysis that we believe would be most helpful. The Associations respectfully request that the CFPB extend the comment periods by an additional 30 days for the requests listed above, and propose the following updated schedule:<sup>6</sup>

Request for Information	Current Due Date	Proposed Due Date
Civil Investigative Demands and Associated Processes	March 27, 2018	April 26, 2018
Rules of Practice for Adjudication Proceedings	April 6, 2018	May 7, 2018
Enforcement Processes	April 13, 2018	May 14, 2018

We note that this additional time would align with the CFPB’s most recent requests for information, which allow for a 90-day comment period.

The Associations appreciate the Bureau’s consideration of our request. If it would be helpful to discuss the Associations’ views on the general or specific concerns raised in this letter, please contact Richard Foster at [Richard.Foster@FSRoundtable.org](mailto:Richard.Foster@FSRoundtable.org) or Steven I. Zeisel at [szeisel@consumerbankers.com](mailto:szeisel@consumerbankers.com).

Respectfully Submitted,



Richard Foster  
 Senior Vice President & Senior Counsel  
 for Regulatory and Legal Affairs  
 Financial Services Roundtable



Steven I. Zeisel  
 General Counsel, Executive Vice President  
 Consumer Bankers Association

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<sup>6</sup> To the extent the 30th day falls on a holiday or weekend, we request that the deadline be extended to the following business day.