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National Association of Federal Credit Unions | www.nafcu.org

May 20, 2014

The Honorable Shelley Moore Capito
Chairman
House Financial Services Subcommittee on
Financial Institutions and Consumer Credit
United States House of Representatives
Washington, D.C. 20515

The Honorable Gregory Meeks
Ranking Member
House Financial Services Subcommittee on
Financial Institutions and Consumer Credit
United States House of Representatives
Washington, D.C. 20515

Re: Support for Transparency and Accountability at the Consumer Financial Protection Bureau

Dear Chairman Capito and Ranking Member Meeks:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association exclusively representing the interests of our nation's federal credit unions, I write today in advance of tomorrow's scheduled hearing, "Legislative Proposals to Improve Transparency and Accountability at the Consumer Financial Protection Bureau (CFPB)." NAFCU appreciates the subcommittee examining proposals to accomplish this goal.

As you know, Members of Congress on both sides of the aisle have acknowledged that credit unions were not the cause of the financial crisis. While NAFCU has long recognized the need for additional consumer protection in the financial services arena, we were the first credit union trade association to oppose CFPB authority over credit unions given their record of member service and the existing laws and regulations they are subject to. While NAFCU maintains that the CFPB should not have authority over credit unions, it has become clear through the rule writing and the examination processes that credit unions are firmly within reach of the new regulatory body. Accordingly, NAFCU member credit unions and their 97 million member owners have a vested interest in ensuring the CFPB operates in a fair and transparent way.


NAFCU believes today's hearing is an important one, as it is critical for the day-to-day operations of credit unions to have a clear understanding of how the CFPB operates. A number of the legislative proposals being considered will provide improvements to the CFPB and some relief to those who are subject to the new regulatory burdens from the Bureau. We look forward to working with the Subcommittee as these provisions move forward in the legislative process.

In particular, NAFCU is glad to see the consideration of Representative Duffy's legislation, the *Bureau Advisory Commission Transparency Act* (H.R. 4262), that would ensure CFPB Credit Union Advisory Council meetings (and others) are open to the public and all minutes and reports are made available as detailed under the *Federal Advisory Committee Act*. We are pleased that, just this week, the CFPB announced that the Bureau was taking the first steps to accomplish this

goal. NAFCU believes the Credit Union Advisory Council plays an important role in informing the CFPB how various rules and regulations would impact credit unions in practice, and encourages the CFPB to take these discussions into account throughout the rule making process.

Again, thank you for holding this important hearing. We look forward to a robust discussion on how the CFPB can operate in a more fair and transparent way. If my colleagues or I can be of assistance to you, or if you have any questions regarding regulatory relief for our nation's credit unions, please feel free to contact myself, or NAFCU's Director of Legislative Affairs, Jillian Pevo at (703) 842-2286.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brad Thaler", with a long horizontal flourish extending to the right.

Brad Thaler
Vice President of Legislative Affairs

cc: Members of the Subcommittee on Financial Institutions and Consumer Credit