

Unfair or Deceptive Acts or Practices (UDAP) Meeting with Members of Public

July 14, 2008

OTS staff met with representatives of the Consumer Federal of America and the Center for Responsible Lending and to discuss their reaction to the May 19, 2008 proposed UDAP rule. These consumer groups were generally very supportive of the proposal. The CFA particularly supported the credit card provisions addressing unfair APR increases on outstanding balances (except for recommending the elimination of the exception for minimum payments not received within 30 days of the due date) and unfair payment allocations. The CFA requested that the limits on security deposits and fees for the issuance or availability of credit be tightened. The CRL requested that the opt-out provision for overdraft services be changed to an opt-in.

In attendance for OTS: John Reich, Scott Polakoff, Bob Russell, John Bowman, Montrice Yakimov, April Breslaw, and Richard Bennett

In attendance for CRL: Eric Halperin

In attendance for CFA: Travis Plunkett