

December 28, 2017

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

**Re: Notice and Request for Comment regarding Consumer Response Intake Form;  
OMB Control Number: 3170-0011**

Dear Ms. Jackson:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau (CFPB or Bureau) request to the Office of Management and Budget (OMB) on the Consumer Response Intake Form (Intake Form).

The CFPB proposes the OMB approval of the collection of information for the Intake Form as it relates to consumer complaints. As HCUA supports the ability for consumers to obtain information on consumer financial products and services, we question the efficacy of the CFPB's complaint process.

Since the number of credit union-related complaints through the CFPB is extremely low, the HCUA urges the Bureau to implement measures to filter out clearly frivolous consumer complaints. To the extent possible, the CFPB should take appropriate steps to verify the legitimacy and accuracy of such complaints. The increasing number of unfounded complaints has a cost to the credit union and in turn its members.

HCUA also requests that the Bureau evaluate its marketing of the complaint system to consumers since the majority of credit unions are not supervised by the CFPB. Such complaints should be directed to the National Credit Union Administration (NCUA), not the CFPB. The CFPB should explore revisions to its marketing of the complaint system to alleviate consumer confusion and reduce unnecessary correspondence between agencies.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas  
President/CEO