



**National Association  
of Federal Credit Unions**  
3138 10th Street North  
Arlington, VA 22201-2149

NAFCU | Your Direct Connection to Education, Advocacy & Advancement

May 26, 2015

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

RE: Comments on Notice and Request for Information Regarding Compliment Database

Dear Ms. Jackson:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association that exclusively represents federal credit unions, I am writing to you regarding the request for input on a potential Consumer Compliment Database that would share consumer compliments about financial institutions. While NAFCU appreciates the CFPB's efforts to highlight consumers' compliments of credit unions and other financial institutions, we remain deeply concerned about the issues with the existing Consumer Complaint Database and we urge the CFPB to address those issues before moving forward with a new "Tell Your Story" channel or Consumer Compliment Database.

Before the CFPB expands the Consumer Database to include compliments, NAFCU and our members strongly believe that the Bureau must first address the reputation and privacy risks posed by the existing Complaint Database. The current system poses serious concerns that personal information may be inadvertently released jeopardizing an individual's secure financial information. Also, the CFPB employs no mechanism to validate a consumer's comments, which creates harmful reputational risks to credit unions and other financial institutions.

Additionally, NAFCU and our members remain skeptical that any potential benefits of the Consumer Complaint Database justify the reputation and privacy risks. In particular, credit unions are often unable to directly communicate with its member who shares a story with the CFPB because the information from a consumer is anonymized. With identifiable information redacted from complaints, credit unions are often not able to respond as effectively as they could if they were dealing with their members directly. This leaves credit unions in a no-win situation. On one hand, if a credit union fails to respond, it

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appears as though there was no acknowledgement or resolution by the credit union of the customer's complaint. On the other hand, credit unions are concerned about the risk of disclosing personally identifiable financial information. This encourages credit unions to respond with a generic response, rather than allowing credit unions to deal with their members directly and personally.

NAFCU appreciates the opportunity to share our thoughts on how the CFPB can improve its Consumer Complaint Database. While we acknowledge the CFPB's efforts to add a Compliment channel to its existing database, NAFCU and our members believe that this initiative is premature given the serious concerns raised in this letter about the Complaint Database. Should you have any questions or concerns, or if you would like to discuss this issue further, please feel free to contact me at [anealon@nafcu.org](mailto:anealon@nafcu.org) or (703) 842-2266.

Sincerely,

A handwritten signature in cursive script that reads "Alicia Nealon". The ink is dark and the signature is fluid and legible.

Alicia Nealon  
Director of Regulatory Affairs