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April 1, 2014

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

RE: Docket No. CFPB-2014-0003; Proposed Rule – Defining Larger Participants of the International Money Transfer Market

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 write to you regarding the Consumer Financial Protection Bureau's (CFPB) proposed rulemaking defining the larger participants of the international money transfer market.

The proposed rule, generally, would amend the current regulation (12 CFR Part 1090) that defines larger participants of certain consumer financial products and services by adding a new section defining larger participants of the international money transfers market. The proposal lays out the framework by which the CFPB would identify a nonbank market for international money transfers and define the "larger participants" of this market that would be subject to the CFPB's supervisory authority. Namely, an entity would be a larger participant if it has at least one million aggregate annual international money transfers.

NAFCU appreciates the CFPB's extension of its larger participant rulemaking authority to nonbanks involved international money transfer market because it creates a more level the playing field for other types of participants already subject to the CFPB's remittance transfer rule. However, the existing remittance transfer rule's provisions continue to present significant problems for credit unions. The remittance rule's requirements remain cost prohibitive for many credit unions. The regulatory burdens imposed by the remittance transfer rule on credit unions have already, and will continue to, lead to a significant reduction in consumers' access to remittance transfer services. Many credit unions, already facing growing and substantial compliance burdens, have or will be forced to discontinue their remittance programs, and those that continue to offer remittances will be forced to significantly increase their members' fees to access remittance services. These requirements will continue to force credit unions out of the market, worsening the competitive environment and reducing consumer choice. Further, the 100- transfer safe harbor threshold is too low to exempt those credit unions that only offer remittance transfers on a limited basis. The CFPB should increase the 100-transfer limit to provide a meaningful safe harbor for those institutions that do not complete these transfers in their normal course of business. Such an increase would not be detrimental to consumers and would still preserve a competitive environment.

NAFCU appreciates the opportunity to provide our comments. Should you have any questions or concerns, please feel free to contact me at ameyster@nafcu.org or (703) 842-2272.

Sincerely,

Angela Meyster
Regulatory Affairs Counsel