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Submitted Electronically

April 3, 2017

Ms. Monica Jackson
Office of the Executive Secretary
Consumer Financial Protection Bureau
1275 First Street NE
Washington, DC 20002

Re: Proposed Rule to Delay the October 1, 2017 effective date of the rule governing Prepaid Accounts Under the Electronic Fund Transfer Act (Regulation E) and the Truth in Lending Act (Regulations Z) by six months, to April 1, 2018.

Dear Ms. Jackson:

The Independent Community Bankers of America¹ (ICBA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau (“Bureau”) proposal to delay the effective date on the prepaid rule.

ICBA fully supports extending the effective date, by six months, from October 1, 2017 to April 1, 2018.

¹ The Independent Community Bankers of America®, the nation’s voice for more than 5,800 community banks of all sizes and charter types, is dedicated exclusively to representing the interests of the community banking industry and its membership through effective advocacy, best-in-class education and high-quality products and services.

With 52,000 locations, nationwide, community banks employ 760,000 Americans, hold \$4.7 trillion in assets, \$3.7 trillion in deposits, and \$3.2 trillion in loans to consumers, small businesses, and the agricultural community. For more information, visit ICBA’s website at www.icba.org.

The Nation’s Voice for Community Banks.®

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In our response to the Bureau's proposed rule to amend Regulation E and Regulation Z in March 2015, ICBA supported an effective date of 18 months from issuance of the final rule to ensure that systems and technology changes could be made to facilitate compliance. We are pleased that the Bureau has proposed an additional six months which effectively provides our members a total of 18 months to implement the final rule.

ICBA appreciates the opportunity to comment on this proposal. If you have any questions or would like additional information, please contact Rhonda Thomas-Whitley (Rhonda.Thomas-Whitley@icba.org) at 202-659-8111.

Sincerely,

/s/

Rhonda Thomas-Whitley
Assistant Vice President & Regulatory Counsel

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