



May 26, 2022

Consumer Financial Protection Bureau
Attention: Chief FOIA Officer
1700 G Street, NW Washington, DC 20552

Re: FOIA Request for Records Pertaining to Implementation of Section 1071 of the Dodd-Frank Act

Dear CFPB FOIA Officer:

This is a request under the Freedom of Information Act.

The undersigned trade associations request the following records relating to the CFPB's implementation of section 1071 of the Dodd Frank Act. In order to help determine our status to assess fees, we are non-profit trade associations, representing a wide swath of financial institutions that will likely be covered by any final 1071 rulemaking.

If there are any fees for search for or copying the documents, please notify us with an estimate of costs before processing this request.

1. Provide records of all communications between the CFPB and financial institutions, software vendors, trade associations, law firms, consumer advocacy groups and other non-profits, and any other organization or entity regarding the 1071 rulemaking that have not been previously made public, for the period of May 1, 2019 through the date of this request.
 - a. Please be sure to include any questionnaires or questions sent to software companies or vendors, that the CFPB contacted during the rulemaking process, or that were not sent but were used to communicate with them by phone or virtual meeting platforms (e.g., Zoom, Webex, etc.) and the software companies' or vendors' responses, for the period of May 1, 2019 through the date of this request.
2. Provide records of all communications internally between CFPB staff, interns, fellows, contractors, and political appointees that discuss whether any of the communications covered in paragraph 1 of this request were subject to the Paperwork Reduction Act.
3. Provide records of all communications internally between CFPB staff, interns, fellows, contractors, and political appointees that discuss whether any of the communications covered in paragraph 1 of this request were classified as *ex parte* communications under the Administrative Procedure Act.
4. Please provide records of the CFPB's written procedures (formal or informal) for determining whether a communication during a rulemaking is to be classified as an *ex parte* communication.

If you have any questions about our request, please contact Michael Emancipator at Michael.Emancipator@icba.org or 202-821-4469.

Sincerely,

American Financial Services Association
Credit Union National Association
Independent Community Bankers of America
National Association of Federally-Insured Credit Unions