October 8, 2014

Federal Docket Management Systems Office
4800 Mark Center Drive
Second Floor, East Tower
Suite 02G09
Alexandria, VA 22350-3100

Re: RIN 0790-AJ10, Limitations on Terms of Consumer Credit Extended to Service Members and Dependents

Dear Sir or Madam:

The undersigned Associations appreciate the opportunity to comment on the proposed expansion of the protections offered to servicemembers and their dependents under the Military Lending Act.

The Associations strongly support efforts to protect the men and women in uniform and their families. For many years, we have enjoyed a successful collaboration with the Department of Defense (the Department) to ensure that servicemembers and their dependents were protected without being deprived of access to beneficial financial products and services that support their financial needs.

After a preliminary review of the proposed changes to the Military Lending Act regulations, we are concerned that some of the proposed changes, such as those involving credit cards as well as common bank products such as overdraft lines of credit and personal loans, could harm servicemembers and their dependents and that some of the proposed steps could have consequences that impede access to mainstream credit products for military families.

Additionally, the proposed rule adds new and complex burdens to installment lenders, many of whom are regulated by states. These companies need additional time to determine the impact on existing state laws and regulations.

Because of the potential impact on servicemembers and their dependents and because some of the changes present complex technical and operational challenges that must be evaluated thoroughly, our members need additional time to provide thorough and responsive comments. Moreover, the financial sector is facing other material regulatory changes that are being addressed in the immediate term that make it difficult to give the proposal adequate consideration in the time frame allotted.

The Associations believe that a 45-day extension would help ensure the time to collect feedback from our members and offer comment. Initially, we considered a 30-day extension but, due to the holidays and other competing year-end priorities, feel 45 days would be more feasible.

If you have any questions or need additional information, please contact

Sincerely,

American Bankers Association
American Financial Services Association
Association of Military Banks of America
Consumer Bankers Association
Financial Services Roundtable
Independent Community Bankers of America