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Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW.
Washington, DC 20429

May 22, 2013

**Re: Docket ID OCC-2013-0005: Proposed Guidance on Deposit Advance Products
Federal Deposit Insurance Corporation 6714-01-P**

To Whom It May Concern:

As the Office of the Comptroller of the Currency (OCC) and Federal Deposit Insurance Corporation (FDIC) continue to review proposed guidance on bank deposit advance products, we would like to give comment on the consumer credit viewpoint.

We, the Pennsylvania Consumer Credit Association believe that there is a critical need to protect consumers from unregulated lending scams. However, this potential proposed guidance by the two agencies could actually curb legitimate credit sources to the American consumer and drive them to unregulated sources of credit.

One example of unregulated lending practices taking place in Pennsylvania today is the recent aggressive entry of Native American tribal lending into the online marketplace. These tribal lenders currently have complete and unregulated authority to prey on Pennsylvania consumers without any legitimate companies offering a legal alternative.

Any shift in a regulatory approach should bolster the options offered by law-abiding lenders in order to help consumers need for credit. Arbitrary rules such as those proposed dictate winners and losers. In this case, the winners would be unregulated lenders and the losers would be law-abiding lenders. It will also likely drive consumers to banks' preferred short-term lending product – overdraft protection – which is more expensive or to riskier, unregulated options such as unlicensed lenders.

We encourage the OCC and FDIC to carefully consider consumers' short-term credit experience and perspective, with an eye toward rulemaking that consistently and fairly regulates the services consumers depend upon – from cash advances to overdraft protection – while preserving the important role of short-term credit in the American economy and empowering consumers to make sensible financial decisions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Al Bowman", is written over a white background.

Al Bowman
Executive Director
Pennsylvania Consumer Credit Association