



PLAZA DE LA RAZA

CULTURAL CENTER FOR THE ARTS & EDUCATION



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Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street, SW., Suite 3E-218
Mail Stop 9W-11
Washington, DC 20219

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
Docket ID FDIC-2013-0043: Proposed Guidance on Deposit Advance Products

Dear Comptroller Curry and Chairman Gruenberg,

On behalf of the Plaza de la Raza, I want to encourage the Office of the Comptroller of the Currency (OCC) and Federal Deposit Insurance Corporation's (FDIC) to thoroughly examine the potential impact that the proposed guidance on deposit advance products can have on our consumers. In such a harsh economic environment, it is imperative that we provide consumers with a variety of credit options, not constrict them as suggested in the proposed guidance. I ask that you please consider the needs of our members when determining the effect of the aforementioned guidance.

In these economic times, Americans continue to struggle to make ends meet, driving a need and demand for short-term credit. A recent report from the National Bureau of Economic Research (NBER) found that one in four Americans have used various forms of short-term credit – payday loans, auto title loans, and similar services – over the last five years. These short-term credit options help consumers manage shortfalls and avoid late payment fees, damage to credit scores or a loss of critical services such as utilities and healthcare. Consumers value these legitimate and regulated. as use them only when they need them.

Regulations that randomly limit consumers' credit options risk a dangerous domino effect. Restricting consumers' access to certain forms of short-term credit such as advance products stifles competition and does nothing to address their continued need for credit.

I 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,

Maria Jimenez-Torres
Executive Director
Plaza de la Raza