

From: Diana Mejia <DIANAM@ypi.org>
Sent: Thursday, November 15, 2018 3:53 PM
To: Comments
Subject: RIN 3064-ZA04
Attachments: RIN 3064-ZA04.pdf

Please review. Thanks.

Sincerely,

Diana Mejia

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FEDERAL DEPOSIT INSURANCE CORPORATION

RIN 3064-ZA04

Request for Information on Small-Dollar Lending

AGENCY: Federal Deposit Insurance Corporation (FDIC).

ACTION: Notice and Request for Information.

SUMMARY: The FDIC is seeking comments and information from interested parties on small-dollar lending, including steps that can be taken to encourage FDIC-supervised financial institutions (banks) to offer small-dollar credit products that are responsive to customers' needs and that are underwritten and structured prudently and responsibly.

DATES: Comments must be received by [60 days after date of publication]

ADDRESSES: You may submit comments, identified by RIN 3064-ZA04, by any of the following methods:

- *Agency Website:* <https://www.fdic.gov/regulations/laws/federal/>. Follow the instructions for submitting comments on the Agency Website.

- *Email: Comments@fdic.gov.* Include the RIN 3064-ZA04 in the subject line of the message.
- *Mail:* Robert E. Feldman, Executive Secretary, Attention: Comments, Federal Deposit Insurance Corporation, 550 17th Street, NW, Washington, DC 20429.
- *Hand Delivery:* Comments may be hand-delivered to the guard station at the rear of the 550 17th Street, NW, building (located on F Street) on business days between 7:00 a.m. and 5:00 p.m.

Public Inspection: All comments received must include the agency name and RIN for this rulemaking. All comments received will be posted without change to <https://www.fdic.gov/regulations/laws/federal/>—including any personal information provided—for public inspection. Paper copies of public comments may be ordered from the FDIC Public Information Center, 3501 North Fairfax Drive, Room E-1002, Arlington, VA 22226 by telephone at (877) 275-3342 or (703) 562-2200.

FOR FURTHER INFORMATION CONTACT:

Paul Robin, Section Chief, (202) 898-6818, probin@fdic.gov.

SUPPLEMENTARY INFORMATION:

The FDIC is responsible for maintaining stability and public confidence in the nation's financial system by insuring deposits, examining and supervising financial institutions for safety and soundness and consumer protection, making large and complex financial institutions resolvable, and managing receiverships. As discussed further below, the

FDIC is soliciting public comments on issues related to small-dollar lending by banks. Specifically, we are requesting information on the consumer demand for small-dollar credit products, the supply of small-dollar credit products currently offered by banks, and whether there are steps the FDIC could take to better enable banks to provide such products to consumers to meet demand.

Overview of Request for Information

The Federal Deposit Insurance Corporation (FDIC) is issuing this request for information (RFI) to seek public input on steps the FDIC could take to encourage FDIC-supervised institutions to offer responsible, prudently underwritten small-dollar credit products that are economically viable and address the credit needs of bank customers. This effort is consistent with the FDIC's commitment to increase transparency, improve efficiency, support innovation, and provide opportunities for public feedback on issues affecting FDIC-supervised institutions and their customers.

The FDIC recognizes the important role small-dollar credit products can play, as part of the spectrum of credit and savings products offered by banks, in helping consumers meet the need for credit for purposes such as addressing cash-flow imbalances, unexpected expenses, or income volatility. Recent research from the FDIC indicates that 20 percent of U.S. households reported that their income varied "somewhat" or "a lot" from month-to-month.¹ Moreover, according to research from the Federal Reserve, if faced with a

¹ "2017 FDIC National Survey of Unbanked and Underbanked Households," Federal Deposit Insurance Corporation, October 2018.

hypothetical \$400 expense, 4 in 10 U.S. adults in 2017 would borrow, sell something, or not be able to pay.²

Given the unique role banks play in the communities they serve and the benefits to consumers of having a relationship with an insured financial institution, banks are well-positioned to address the credit needs of their customers in a responsible manner. While some banks currently offer small-dollar credit products, there may be additional opportunities for banks to address unmet demand for consumer credit in their communities. For example, research from the FDIC suggests that in 2017, 14.8 million or nearly 13 percent of U.S. households may have had unmet demand for small-dollar credit from banks. A majority of these households reported staying current on bills in the prior year. Although the vast majority (nearly 9 in 10) of these households had a bank account, fewer than one in three applied for credit from a bank.³ Some of these households may present opportunities for banks to extend credit in the form of small-dollar loans.

Accordingly, the FDIC invites public comments on the full spectrum of issues related to the role banks can play in offering small-dollar credit, obstacles – regulatory and non-regulatory – that banks currently encounter in offering such credit, and whether there are steps the FDIC could take to enable banks to better serve this market.

² “Report on the Economic Well Being of U.S. Households in 2017,” Board of Governors of the Federal Reserve System, May 2018.

³ “2017 FDIC National Survey of Unbanked and Underbanked Households,” Federal Deposit Insurance Corporation, October 2018.

Suggested Topics for Commenters

The FDIC encourages comments from all interested members of the public, including but not limited to insured depository institutions, other financial institutions or companies, individual depositors and consumers, consumer groups, trade associations, and other members of the financial services industry. Please be as specific as possible to allow the FDIC to evaluate comments more effectively. In particular, the FDIC requests input on the following more specific topics and questions:

Consumer Demand

1. To what extent is there an unmet consumer demand for small-dollar credit products offered by banks? *To the extent that lending flexibility is practically non-existent. Zero or no access to LMI Communities.*
2. To what extent do banks currently offer small-dollar credit products to meet consumer demand? *Very limited. And sometimes only available to certain communities only.*
3. To what extent and in what ways do entities outside the banking sector currently satisfy the consumer demand for small-dollar credit products? *Large access. They take the time to learn about the community that most needed. Unfortunately, rates are unbearable for many.*
4. What data, information, or other factors should the FDIC consider in assessing the consumer demand for small-dollar credit products? *Talk to non profit organizations who know well the LMI community. Survey Consumer Finance data is useful also to get insight*
Benefits and Risks

5. What are the potential benefits and risks to banks associated with offering

responsible, prudently underwritten small-dollar credit products?

Benefits: Serve 13 percent of U.S. households with unmet need. Boosting the economy.
Risks: Very low if product is well written

6. What are the potential benefits and risks to consumers associated with bank-offered

small-dollar credit products?

(of eradication)
Benefit: Prevention of predatory lending practices

Risks: Very low if product is well written where both parties benefit

7. What are the key ways that banks offering small-dollar loan products should manage

or mitigate risks for banks and risks for consumers?

Using research with a non-biased view & applying techniques that will benefit both parties long term

8. What are the potential benefits and risks related to banks partnering with third parties

to offer small-dollar credit?

— Benefits — ensuring access to those who need them.

— Risks — know it might increase consumer costs if not government sponsored

9. What steps could the FDIC take, consistent with its statutory authority, to encourage

banks to develop and offer responsible, prudently underwritten small-dollar credit

products?

Encourage a culture of long term benefits to hold both parties.

Regulate banks to make sure they are providing responsible products

Challenges

(involved regulatory agencies)

10. Are there any legal, regulatory, or supervisory factors that prevent, restrict,

discourage, or disincentivize banks from offering small-dollar credit products? If so,

please explain.

I would like to learn about what those are

11. Are there any operational, economic, marketplace, or other factors that prevent, restrict, discourage, or disincentivize banks from offering small-dollar credit products? If so, please explain.

I would like to learn about what those are

12. What factors may discourage consumers from seeking responsible, prudently underwritten small-dollar credit products offered by banks?

B Continuous bad experiences from those who suppose to safeguard their money
Product Features

13. Are there specific product features or characteristics of small-dollar loan products that are key to meeting the credit needs of consumers while maintaining prudent

underwriting? - Literature in their language
- Easy to apply.
- Information that they are available

14. Are there specific product features or characteristics that are key to ensuring the economic viability to a bank of responsible, prudently underwritten small-dollar

credit products? - Income driven options.
- Deferred payment options
- Low interest rates

Innovation

15. How can technology improve the ability of banks to offer responsible, prudently underwritten small-dollar loan products in a sustainable and cost-effective manner?

Please specify the technology or technologies and the use case(s).

- Application available on smart phones
- Computers at banks/or credit unions
or tables

16. Are there innovations that might enable banks to better assess the creditworthiness of

potential small-dollar loan borrowers with limited or no credit records with a

nationwide credit reporting agency?

- Alternative credit
- to this info. from bureaus.
- Accessibility with only name & date of birth.

17. What role should the FDIC play, if any, in supporting innovations that enhance

banks' abilities to offer responsible, prudently underwritten small-dollar loans? Are

there specific barriers that prevent banks from implementing such technologies or

innovations?

- Innovations: software that access credit agency reporting data by name & date of birth
- barriers: None that I know of

18. How can technology be leveraged to improve consumers' experiences and reduce

potential risks to consumers associated with small-dollar credit products?

- Easy to understand applications, & friendly
- online portals

Alternatives

19. What other products and services that supplement or complement small-dollar credit

offerings should banks consider? Are there other ways that banks can help

consumers address cash-flow imbalances, unexpected expenses, or income volatility

besides small-dollar credit products?

- = Interest free loans.
- Emergency funds / credits.
- Other - Working & with government agencies to offer incentives, credits for good money management habits.

20. Are there any distinguishing characteristics of particular institutions, such as a bank's

size, complexity, or business model, that the FDIC should consider, and if so how?

- Willingness to bank to want to reach out & serve these communities.
- Creating a culture of long term benefits for all instead of profit driven only

21. Please provide any other comments or information that would be useful for the FDIC to consider.

Dated at Washington, DC, on [date], 2018.
Federal Deposit Insurance Corporation.
Robert E. Feldman,
Executive Secretary.