

December 21, 2018

**By electronic delivery to:**  
**[www.regulations.gov](http://www.regulations.gov)**

**Re: OMB control number 3064-0167**  
**Request for comment on Survey of Unbanked and Underbanked Households**  
**83 Federal Register 55532 (November 6, 2018)**

Ms. Manny Cabeza  
Counsel  
MB-3007  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW  
Washington DC 20420

Dear Ms. Cabeza,

The American Bankers Association<sup>1</sup> (ABA) appreciates the opportunity to provide comments to the Federal Deposit Insurance Corporation's (FDIC) survey collection instrument for its sixth National Survey of Unbanked and Underbanked Households (Household Survey)<sup>2</sup> scheduled to be conducted in partnership with the U.S. Census Bureau as a supplement to its June 2019 Current Population Survey. The Household Survey seeks to measure and track economic inclusion among U.S. households, to identify factors that inhibit the participation of these households in the mainstream banking system, and to identify opportunities to expand the use of banking services among underserved consumers. ABA supports this important inquiry and offers the following comments to the Household Survey.

Starting with Question B30, the Household Survey asks about the participants' experiences with bank accounts, including "checking, savings, and prepaid cards from a bank." We agree that prepaid cards should be classified as "bank accounts," as functionally, prepaid accounts vary little from checking accounts. Both products provide similar deposit options and broad access to deposits through debit cards and electronic banking features (online and mobile). In addition, while many prepaid accounts do not offer check-writing services, some do, just as some checking accounts, such as the FDIC's [Model Safe Account](#),<sup>3</sup> do not. If the purpose is to measure people's use of basic banking services, prepaid cards should be included, as they serve that purpose.

Question BR15 asks how often participants with an account have spoken with a teller or other employee in person at a bank branch in the last 12 months. We recommend adding two short questions to

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<sup>1</sup> The American Bankers Association is the voice of the nation's \$17 trillion banking industry, which is composed of small, regional, and large banks that together employ more than 2 million people, safeguard \$13 trillion in deposits, and extend nearly \$10 trillion in loans.

<sup>2</sup> National Survey of Unbanked and Underbanked Households; Comment Request, 83 Fed. Reg. 55532 (noticed Nov. 6, 2018).

explore the reasons people use branches. The answers to these questions would be helpful to determine the primary reasons customers use and value branches and to identify opportunities to expand banking service options, especially for those who lack convenient access to branches.

Following question BR15, we recommend the FDIC add:

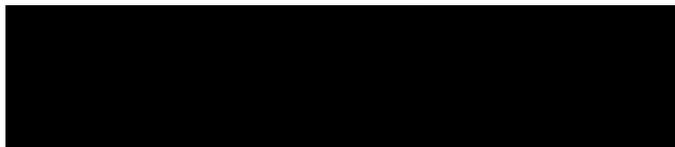
Q. If you have spoken with a teller or other employee in person at a bank branch in the past 12 months, what were the reasons for doing so? Check all that apply.

- Cash a check
- Deposit a check
- Withdraw cash
- Obtain a money order or cashiers' check
- Wire funds
- Use a notary
- Meet face-to- face with someone to sort out a problem or ask questions
- Learn about a new or existing product or service
- Ask for financial advice and learn about bank's advisory services (e.g. brokerage accounts, insurance)
- Use the ATM<sup>3</sup>
- Inquire about loans (including credit card)
- Apply for a loan (including credit card)
- Access a safe deposit box
- Other -- please describe

Q. What were your *primary reasons* for speaking with a teller or other employee in person at a bank branch in the past 12 months? Check four (or other number).

ABA appreciates the opportunity to comment on this important matter and is happy to provide additional information. If you have any questions about these comments or would like to discuss any matter further, please contact Nessa Feddis at 202 663-5433 or [nfeddis@aba.com](mailto:nfeddis@aba.com).

Sincerely,



Nessa E. Feddis  
Senior Vice President & Deputy Chief Counsel for  
Consumer Protection and Payments

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<sup>3</sup> While the Household Survey includes questions on ATM use, ATMs may be inside the bank branch.