



June 27, 2011

BY EMAIL: [regs.comments@occ@treas.gov](mailto:regs.comments@occ@treas.gov) and  
Michael Bylsma, c/o [abdul.islam@occ.treas.gov](mailto:abdul.islam@occ.treas.gov)

Attention: Docket ID OCC-2011-0012  
Office of the Comptroller of the Currency  
250 E Street, SW., Mail Stop 2-3  
Washington, D.C. 20219

Re: Request for Extension of Comment Period  
Guidance on Deposit-Related Consumer Credit Products – Docket ID OCC-2011-0012

Dear Sirs and Madams:

The Clearing House Association L.L.C., the American Bankers Association, the Consumer Bankers Association, and the Independent Community Bankers of America (together the “Commenters”) are writing to request an extension of the comment period for the proposed “Guidance on Deposit-Related Consumer Credit Products” issued by the Office of the Comptroller of the Currency (“OCC”) and published in the Federal Register on June 8, 2011 (“Guidance”). In conversations with our member banks, it has become apparent that the 30-day comment period, currently ending on July 8, 2011 and a week of a federal holiday, does not provide adequate time to fully understand the implications and impact of the Guidance and to provide meaningful comments.

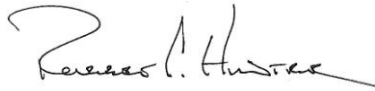
Because of the operational complexities of the proposed guidance, and the potentially significant financial impact it may have on covered institutions, we believe that it is appropriate to allow affected institutions more time to review and comment on the proposed Guidance. Therefore, we respectfully request that the OCC consider extending the current July 8, 2011 comment period deadline for at least an additional 30 days.

Thank you for considering our request. If you have any questions or wish to discuss this request, please do not hesitate to contact any of the persons undersigned below.

[Signatures on following page]

Yours very truly,

**The Clearing House Association, LLC**



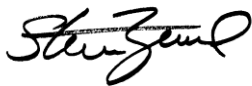
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**American Bankers Association**



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**Consumer Bankers Association**



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**Independent Community Bankers Association**

/s/

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## **Information Regarding the Commenting Organizations**

### **American Bankers Association**

The American Bankers Association represents banks of all sizes and charters and is the voice for the nation's \$13 trillion banking industry and its two million employees. The majority of ABA's members are banks with less than \$165 million in assets.

### **The Clearing House**

Established in 1853, The Clearing House is the nation's oldest payments company and banking association. The Clearing House is owned by 21 of the largest commercial banks in America, which employ 1.4 million people domestically and hold more than half of all U.S. deposits. The Payments Company within The Clearing House clears and settles approximately \$2 trillion daily, representing nearly half of the U.S. volume of ACH, wire and check image transactions. The Clearing House Association is a nonpartisan advocacy organization within The Clearing House that represents, through regulatory comment letters, amicus briefs and white papers, the interests of 13 of its owner banks on a variety of systemically important bank policy issues.

### **Consumer Bankers Association**

The Consumer Bankers Association ("CBA") is the only national financial trade group focused exclusively on retail banking and personal financial services — banking services geared toward consumers and small businesses. As the recognized voice on retail banking issues, CBA provides leadership, education, research, and federal representation on retail banking issues. CBA members include the nation's largest bank holding companies as well as regional and super-community banks that collectively hold two-thirds of the industry's total assets.

### **Independent Community Bankers of America**

The Independent Community Bankers of America represents nearly 5,000 community banks of all sizes and charter types throughout the United States and is dedicated exclusively to representing the interests of the community banking industry and the communities and customers we serve. ICBA aggregates the power of its members to provide a voice for community banking interests in Washington, resources to enhance community bank education and marketability, and profitability options to help community banks compete in an ever changing marketplace. With nearly 5,000 members, representing more than 20,000 locations nationwide and employing nearly 300,000 Americans, ICBA members hold \$1.2 trillion in assets, \$960 billion in deposits, and \$750 billion in loans to consumers, small businesses and the agricultural community. For more information, visit ICBA's website at [www.icba.org](http://www.icba.org).