

Dear Federal Reserve and NCUA:

I am vehemently opposed to any "watering down" of any proposed consumer-favorable legislation/Rules. To the contrary, the Truth in Lending and Fair Credit Billing Acts, for example, while a good start, are insufficient to protect consumers and in ensuring a level playing field in banking and credit transactions. For example, certain applicable provisions of TILA/FCBA do not provide for a private right of action for violations of same, which is absurd, for it is by far precisely that type of remedy which has the greatest deterrent effect on the banking industry and is usually the only means for those who have been injured/damaged by such wrongs to be compensated.

In addition, on a separate but related note, I have attached hereto a courtesy copy of my letter/fax to the OCC's Consumer [Non] Assistance Group. In short, it is my belief and opinion that the OCC's so-called "Consumer Assistance Group" [and the OCC in general] is one of the most unhelpful and consumer unfriendly organizations with which I have ever dealt [both personally and as a Consumer Law attorney and advocate]. Specifically, rather than working to assist consumers by, at the first step, ensuring the complaint-making process is receptive, straightforward, simple and fair, it utilizes its best efforts to thwart the complaint-making process at every opportunity and implements procedures and policies that make it virtually impossible for the "average consumer" - let alone a sophisticated attorney - to actually receive any worthwhile assistance. The attached letter speaks for itself and contains much more detail on the issue.

Thank you in advance for your time and assistance, and I look forward to any insight or response you might offer.

Regards,

Auden Grumet