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Tulsa, Oklahoma 74102-2300

April 14, 2011

Jennifer J. Johnson
Secretary, Board of Governors of the Federal Reserve System
20th Street & Constitution Avenue, NW
Washington, DC 20551

Re: Notice of Proposed Rule Making
Docket No. R-1408
12 CFR Part 202
Equal Credit Opportunity

Dear Ms. Johnson:

Thank you for the opportunity to comment on the Federal Reserve System's Equal Credit Opportunity proposed rule. BOK Financial Corporation (BOKF) is a \$24 billion regional financial services company based in Tulsa, Oklahoma. Through our bank, BOKF NA, our assets are centered in Oklahoma, Texas, New Mexico, Arkansas, Arizona, Colorado, Kansas and Missouri. BOKF is the largest bank holding company that did not take TARP funds.

We support regulations and guidance dictating clear, easy to read disclosures and notifications regarding an applicant's credit needs. The proposed amendments to Appendix C of Part 202 – Sample Notification Forms C-1 through C-5 to include the content requirements of section 615(a) of the Fair Credit Reporting Act added by section 1100F of the Dodd-Frank Wall Street Reform and Consumer Protection Act while appropriate, could be enhanced.

While the usage of model forms is optional, financial institutions appreciate and incorporate regulatory guidance identifying key components of a document that your consumer testing has identified as most important. Given the volume of information provided within an adverse action notice, the use of visual spacing, bold/italics and tables would focus the applicant's attention to key information within the notice.

Similar to the January 30, 2011 amendments to Regulation Z regarding payment information in a required format, model forms incorporating the above mentioned formatting tools direct the applicant to the key factor(s) a consumer wants to know. With the inclusion of the additional information necessary to incorporate section 1100F of

Dodd-Frank, the adverse action notice is approaching the point where the consumer will see this document as meaningless without the use of visual aides. Disclosure within a one-page format should be the optimal approach..

When a consumer has been denied credit and receives the requisite written notification, they are interested in three issues:

1. Why was I denied credit?
2. What is my credit score?
3. What factor(s) adversely affected my score?

To improve readability and meaning, we request that the Federal Reserve enhance the model forms to incorporate the formatting options described above.

Revisions to existing forms require sufficient time to design, test and train staff on the changes. As the requirements of section 1100F of Dodd-Frank become effective July 21, 2011, this leaves little time to meet this deadline. The estimated time of 16 hours to update systems to comply with the disclosure requirements is grossly inaccurate. Financial institutions utilize a variety of automated and manual processes when processing a credit request and the proposed changes to model forms, while deliverable, will involve significant resources (IT development and financial costs) to achieve regulatory compliance.

We request the Federal Reserve delay enforcement of this requirement to allow financial institution sufficient time to accomplish the above tasks.

We appreciate the opportunity to comment on this proposed rule. We welcome the opportunity to work with the Federal Reserve to improve consumer disclosures. Should you have any questions regarding our recommendations or need further detail, please contact me at 918-488-7378.

Sincerely,

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cc:

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