

From: Bank of Central Florida, Cheryl Nakashige
Subject: Regulation B

Comments:

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Proposal: Regulation B - Equal Credit Opportunity
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Comments:

Thank you for the opportunity to comment on recent Regulation B revisions in regard to adverse action notices. We currently utilize an adverse action notice that provides the "right to request specific reasons for credit denial" (adverse action notices cannot be system generated with current software and are manually typed). The proposal includes various sample disclosures that contain the new credit score, date, score ranges, and key factors affecting the credit score. As part of our internal FCRA procedures for the risk-based pricing notices, we already provide the H-2 through H-5 notices, whichever is applicable, for ALL denied loan applications. It would be duplicative work on our Bank's part to have to MANUALLY type all of the risk-based pricing information on the adverse action notice when a separate document provides all of the SAME information. An alternative rule should be included in Regulation B where compliance is sufficient if the separate risk-based pricing notice already is provided. We can certainly add verbiage to the adverse action notice that we obtained the credit score and used it in the credit decision but to refer to the separate risk-based pricing notice for details. We ask that you please consider this proposal suggestion in order not to burden banks from having to duplicate credit score information that already is provided to them where such an internal procedure has been established. Thank you for your consideration. Sincerely, Cheryl Nakashige Bank of Central Florida