Proposal: FR KK Reporting and Recordkeeping Requirements Associated with Regulation KK.

(ICP 202306 Pub'd 3/1/

Description:

Comment ID: 154623

From: Aram Homampour

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Comments:

Date: Mar 07, 2023

Proposal: Agency Information Collection [ICP-202306]

Document ID: ICP-202306

Revision: 1

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Your comment: 1) Please look into this simple issue; Bank are able To affect a credit card holders credit in a metric that is supposed to demonstrate the debtors credit usage skills. By allowing banks to report reduced credit limits imitated After the fact based on banks perceived and overall risk takes the control of the card holders ability to manage their credit ration. Often a card may be at 30% and the bank cut the limit to 100%: if you want to say the bank has aright to limit their potential losses fine but then remove the ratio from Credit ratings. This crooked ability the banks have takes all the power out of the consumer and puts it in the banks self serving hands. They force the consumer to borrow at a higher rate by forcing the credit score lower. The credit score should be based only on factors within the control of the consumer. This loop hole needs to be closed and it will force our economy over the edge when this cause massive defaults. The banks make an agreement the card holder agrees to the terms and the bank penalizes the consumer for using the card. 2) when libir was 10% credit card rates were 18% when the fed rate was 0% the credit cards best rate was 15% the bank never passed on the free money they were getting so now they are charging historically high rates of 25% for tier one credit. Do your jobs stop protecting the banks