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September 18, 2013

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PLEASE REPLY TO:
Connecticut Office

Chief, Information Office
Information Quality Program
Bureau of Consumer Financial Protection
1700 G Street, N.W.
Washington, D.C. 20552-0003

***Re: Appeal of Denial of Petition
of Community Financial Services Association of America, Ltd.
For Retraction Of “Payday Loans and Deposit Advance Products:
A White Paper of Initial Data Findings”***

Dear Sir or Madam:

Notice is hereby given that Community Financial Services Association of America, Ltd. (“CFSAs”) appeals from the Bureau’s letter signed by Ron Borzekowski and B. Corey Stone, Jr. and dated August 19, 2013 (the “Response”) which denied CFSAs’ petition dated June 20, 2013 for the public retraction of the Bureau’s publication entitled “Payday Loans and Deposit Advance Products: A White Paper of Initial Data Findings” (the “White Paper”) and for alternative relief.

CFSAs appeals from each and every aspect of the Response, except to the limited extent that the Bureau has supplemented the White Paper as it asserts in the Response.

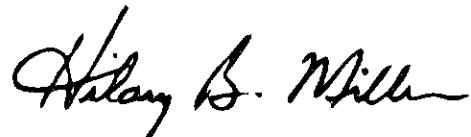
Specifically, CFSAs appeals from: (a) the denial of CFSAs’ request to retract the White Paper in its entirety; (b) the Bureau’s continued assertion of the objective and useful nature of the Bureau’s sampling methodology; (c) the Bureau’s denial of CFSAs’ request to delete references to consumer harm and consumer understanding, notwithstanding that these subjects were not topics of the study giving rise to the White Paper; (d) the Bureau’s denial of CFSAs’ request to delete unreliable and inconsistent consumer-income data; (e) the Bureau’s failure or refusal to disclose and amend the White Paper to refer to the number of payday lenders whose data were included in the White Paper and the basis on which they were selected; and (f) the Bureau’s failure or refusal to identify and amend the White Paper to include a reference to the number of borrowers whose data were included in the study for the White Paper. The Bureau’s Response failed to resolve any of these requests by denying them in their entirety.

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A conference is respectfully requested prior to your determination of this appeal.

All communications with CFSB regarding this petition should be directed to the undersigned. Kindly acknowledge receipt hereof in a reply email message.

Very truly yours,



HILARY B. MILLER

VIA ELECTRONIC MAIL: CFPB_IQ_Submissions@cfpb.gov

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