



February 2, 2015

Consumer Financial Protection Bureau  
Attention: PRA Office  
1700 G Street NW  
Washington, DC 20522

Re: CFPB's Consumer Complaint Intake System Company Portal Boarding Form Information  
Collection System/ Docket No. CFPB-2014-0032/ OMB Control Number: 3170-XXXX

To Whom It May Concern:

The American Land Title Association<sup>1</sup> (ALTA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (Bureau) proposal to create a new method of information collection entitled "CFPB's Consumer Complaint Intake System Company Portal Boarding Form Information Collection System" (Portal). To ensure that both consumers and companies benefit from the Portal, ALTA urges the Bureau to modify its proposal to reduce the amount of information requested from companies and to address how the Bureau envisions its role following a complaint submission.

Providing companies with the opportunity join the Portal prior to a consumer complaint facilitates early notice of complaints and ensures that all necessary software and security protocols are already in place so that companies can quickly respond to complaints. The Portal enables companies to remain engaged with their consumers and helps companies resolve issues quickly and efficiently, resulting in a better consumer experience.

We suggest that the Bureau make some minor, but important, edits to the Portal's Boarding Form (Form) to make it easier for companies to participate in the Portal. The Form requests a large amount of information from companies, making it difficult for companies to join the Portal. For example, the Form requires companies to submit the tax ID and state business licenses for every

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<sup>1</sup> The American Land Title Association, founded in 1907, is a national trade association and voice of the real estate settlement services, abstract and title insurance industry. ALTA represents over 5,400 member companies. With more than 8,000 offices throughout the country, ALTA members operate in every county in the United States to search, review and insure land titles to protect home buyers and mortgage lenders who invest in real estate. ALTA members include title insurance companies, title agents, independent abstracters, title searchers and attorneys, ranging from small, one-county operations to large national title insurers.

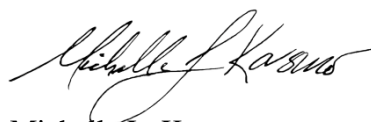
“subsidiary or affiliate”<sup>2</sup> of the company. Some of these “subsidiaries or affiliates” may be outside of the purview of the Bureau as many companies that would join the Portal have “subsidiaries or affiliates” that are not involved in financial services.

The Bureau should modify its Form to request information only about business activities that involve financial services to reduce the information requested by the Form and to make it easier for companies to comply with the Bureau’s information request. The Bureau should include language in the Portal that appropriately limits the scope of the request of information to “subsidiaries and affiliates” that provide financial services. As the Bureau included in the request for information in the original Consumer Complaint Database, the Bureau should request information from only “*applicable*” affiliates and subsidiary companies rather than all subsidiaries and affiliated companies generally. With this modification, consumers will still have the ability to easily identify parent companies and their subsidiaries when issuing a complaint. This transparency allows consumers to assess service providers and allows the Bureau to appropriately monitor and address harmful company practices.

Beyond establishing the Portal, the Bureau needs to clarify the role it will take in the complaint submission and review process. As ALTA has previously stated in a comment letter to the Bureau, a robust complaint screening and verification process would be a significant improvement to the Bureau’s complaint collection process and would provide consumers with the most accurate information about companies listed in the Portal.<sup>3</sup> Furthermore, the Bureau should clarify how it will communicate with companies following a consumer complaint submission. The Bureau should also address how it will train its staff to manage submitted complaints, and whether staff will examine companies’ processes for responding to complaints.

The Portal has the potential to be a useful tool for consumers and companies alike, and ALTA urges the Bureau to modify its proposal to ensure the Portal can result in a better consumer experience. ALTA looks forward to continuing to work with the Bureau to create a useful tool to submit and resolve consumer complaints. Should you have any questions about this comment letter, please contact Steve Gottheim, legislative and regulatory counsel, at [steve@alta.org](mailto:steve@alta.org) or 202-261-2943.

Sincerely,



Michelle L. Korsmo  
Chief Executive Officer

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<sup>2</sup> ALTA uses the term “subsidiary and affiliate” as used by the Bureau in its Consumer Response’s Company Portal Boarding Form, Section D “Affiliates and Subsidiaries Information.”

<sup>3</sup> Please see ALTA’s Comment Letter on the Consumer Complaint Narrative Data, submitted on Sept. 22, 2014.