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December 15, 2025

Via Electronic Submission

Comment Intake—1071 Reconsideration NPRM
c/o Legal Division Docket Manager
Consumer Financial Protection Bureau
1700 Street NW
Washington, DC 20552

Re: FRB Docket No. CFPB-2025-0040 and RIN 3170-AB40;

To Whom It May Concern:

On behalf of the members of the Community Development Bankers Association (CDBA), we respectfully submit the enclosed comments in response to the Thursday, November 13, 2025 publication by the Bureau of Consumer Financial Protection (Bureau) of an invitation to comment on the Notice of Proposed Rulemaking (NPR) regarding provisions of Regulation B, subpart B, implementing changes to the Equal Credit Opportunity Act made by section 1071 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

The Bureau is reconsidering coverage of certain credit transactions and financial institutions; the small business definition; inclusion and collection of certain data points; and the compliance date.

CDBA is the national trade association for banks that are U.S. Treasury designated Community Development Financial Institutions (CDFIs). CDFI banks have a strong focus on small business lending, and promote entrepreneurship and economic opportunity by serving small businesses located in low-income, rural and small-town communities. We strongly support efforts to ensure small businesses are well and fairly served, and appreciate the Bureau's efforts to fine-tune the 2023 final rule.

CDBA has submitted comments to the Bureau throughout the 1071 rule making process. In regards to this request, we respectfully refer the Bureau to our prior letters. In those letters, we recommended general principles that we believe are key to the rule's success. We also submitted detailed comments on definitions of covered lenders, borrowers and products, the collection of mandatory vs. discretionary data points, borrower privacy, data storage, reporting timing and implementation period.

On behalf of our members, we thank Bureau staff for their efforts to refine this rule, and stand ready to work with the Bureau on the rule's implementation. If you have any questions, please contact Jeannine Jacokes, CDBA Chief Executive Officer, at 202-689-8935 ext. 222 or jacokesj@pcgloanfund.org, or Brian Blake, Chief Public Policy Officer at 646-283-7929 or blakeb@pcgloanfund.org.

Sincerely,

Brian Blake
Chief Public Policy Officer