

Congress of the United States
Washington, DC 20515

March 22, 2024

The Honorable Rohit Chopra
Director
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

Dear Director Chopra,

We are writing to express our significant concern about the Consumer Financial Protection Bureau's (CFPB) "Auto Finance Data Project" and request that it refrain from proceeding with this new information collection.

The CFPB is proposing to collect a new set of data annually from auto finance businesses that acquire more than 20,000 auto loans in a calendar year. However, the CFPB has failed to justify why this overreaching data collection is necessary for market monitoring purposes. The information the CFPB is seeking to collect will significantly burden small businesses with more reporting requirements, risk Americans' right to privacy by allowing the CFPB to access sensitive customer and business information, and ignores Congressional intent set out in Section 1029 of the Dodd Frank Act relating to the "exclusion of auto dealers."

We have heard from stakeholders throughout the industry that the CFPB's burden estimate, which claims compliance would simply require 20 additional minutes of businesses' time, is grossly inaccurate. The nine auto finance companies examined last year as part of the CFPB's Auto Finance Data Pilot program reported spending several hundred hours clarifying, compiling, reviewing, and submitting a long list of detailed data points. Businesses are already facing operational challenges and economic headwinds in the current environment. Piling on additional reporting requirements, without a clear purpose, will further strain resources.

Furthermore, under this project, the CFPB is seeking to collect personally-identifiable financial information on millions of Americans. The collection is comprehensive and detailed, allowing the CFPB to easily identify the individual Americans associated with each account. The CFPB will have more than enough information to identify individual borrowers and to understand the finances of each in considerable detail. This is not only a violation of the CFPB's rulemaking authority but also worrisome given the CFPB's recent data breach.

Lastly, Section 1029 defines the CFPB's responsibilities and objectives, while clearly stating that the auto dealer industry is exempt from the CFPB's rulemaking, supervisory, and enforcement

jurisdiction. By expanding data collection without a clear explanation of how it serves to protect consumers, the CFPB is embarking on an unauthorized fishing expedition rather than fulfilling its mandate to carry out the purposes and objectives of the Federal consumer financial laws. Congress intended the CFPB to strike a balance between effective oversight and practical considerations for businesses, which seems compromised by the extensive data collection proposal.

We urge you to rescind the Auto Finance Data Project and return to focusing on the CFPB's intended mission of protecting consumers.

Sincerely,



Roger Williams
Member of Congress



Blaine Luetkemeyer
Member of Congress



Dan Meuser
Member of Congress



Scott Fitzgerald
Member of Congress



Pete Sessions
Member of Congress



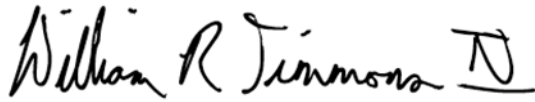
Bill Posey
Member of Congress



Warren Davidson
Member of Congress



Barry Loudermilk
Member of Congress



William R. Timmons, IV
Member of Congress



Andrew R. Garbarino
Member of Congress



Byron Donalds
Member of Congress



Young Kim
Member of Congress



Erin Houchin
Member of Congress



Andy Barr
Member of Congress



Andy Ogles
Member of Congress



Frank D. Lucas
Member of Congress



Ann Wagner
Member of Congress



French Hill
Member of Congress