EXAMPLE OF OUTREACH EMAIL FOR REMITTANCE TRANSFER RULE IMPLEMENTATION CASE STUDIES

Thank you for agreeing to discuss COMPANY X's implementation of subpart B of Regulation E. Unless stated otherwise, the Bureau considers communications regarding this topic with the staff of its Division of Research, Markets, and Regulations to be part of its Remittance Transfer Rule Implementation Monitoring Project. These conversations are entirely voluntary, and we can adjust the length of them according to your availability. We expect that this conversation could be as short as one hour or could last as long as 5 hours. The Office of Management and Budget has approved the topics of these conversations under the Paperwork Reduction Act. The OMB control number for this collection is 3170-0032.

The Bureau will treat any information that COMPANY X provides as part of this Project in a manner consistent with the interim final rule regarding Disclosure of Records and Information, 12 C.F.R. pt. 1070, that the Bureau has promulgated to safeguard against the improper disclosure of business information and other confidential information.

If the information that you provide through these conversations is requested under the Freedom of Information Act, the Bureau will withhold such responses to the extent that it determines that they constitute trade secrets or confidential commercial information that you would not ordinarily make public. The Bureau will deem any such trade secrets or confidential commercial information to be "confidential information" for purposes of the Bureau's confidentiality rules at 12 C.F.R. 1070.40 *et seq*.

To aid the Bureau in identifying the information as exempt and confidential, we recommend that COMPANY X label documents submitted to the Bureau that COMPANY X believes should be treated as such. The label could be along the following lines:

The enclosed consists of trade secrets or confidential commercial information that is subject to 5 U.S.C. 552(b)(4) because COMPANY X provides the information on a voluntary basis and it is not of the sort that COMPANY X customarily makes public. Pursuant to 12 C.F.R. 1070.20, please notify COMPANY X in the event that the CFPB receives a Freedom of Information Act request for this information.

The Bureau will use information received through its Remittance Rule Implementation Monitoring Project to inform its monitoring of the remittance transfer market. Additionally, the Bureau may elect to use information received for any other lawful Bureau activity or purpose that does not involve the public disclosure of the information in a manner that would violate the Bureau's interim final rule regarding Disclosure of Records and Information, 12 C.F.R. pt 1070. Pursuant to its interim final rule, the Bureau may disclose materials derived or created from confidential information to the extent that such materials are not individually identifiable to COMPANY X. These materials could include published reports related to the remittance transfer market, and implementation of subpart B of Regulation E.

We look forward to the conversation. Please let me know if you have any further questions or concerns about this policy.