



February 9, 2026

Consumer Financial Protection Bureau
Attention: PRA Office
1700 G Street NW
Washington, DC 20552

RE: Truth in Savings (Regulation DD)
OMB Control Number: 3170-0004
Docket No. CFPB-2025-0048

To Whom It May Concern:

We are writing in response to the Consumer Financial Protection Bureau's (CFPB) request for comment on Truth in Savings (Regulation DD) and thank you for the opportunity to provide feedback.

Established in 1934, Suncoast Credit Union (Suncoast) is a state-chartered federally insured credit union headquartered in the state of Florida with over \$19 billion in assets, 79 branches, and serving 1.37 million members predominantly in the state of Florida. Credit unions are not-for-profit, which allows us to put more back to our members and the communities we serve with various products and services.

Suncoast is grateful for the opportunity to provide feedback to the CFPB regarding its request for comment on Truth in Savings (Regulation DD).

The request mentioned for respondents to consider the following:

- Whether the collection of information is necessary.
- The accuracy of CFPB's estimate of the burden.
- Ways to enhance the quality, utility and clarity of information.
- Ways to minimize the burden of the collection of information.

Suncoast believes the collection of information required under the Truth in Savings Act (TISA) and Regulation DD remains necessary for the proper performance of the CFPB's statutory functions. These disclosure requirements promote transparency and consistency in the presentation of deposit account terms, enabling consumers to make informed comparisons among financial institutions. In addition, the information collected facilitates effective supervision and oversight by allowing regulators to assess compliance with applicable disclosure standards and to ensure

disclosures are accurate and applied uniformly. Accordingly, the collection continues to serve a clear consumer-protection purpose and has practical utility.

The CFPB's burden estimates generally reflect the level of effort required to comply with the applicable requirements; however, additional refinements could improve accuracy. Compliance burdens may vary based on factors such as product complexity, the frequency and scope of required updates, and the extent to which compliance processes are automated or manual. In practice, compliance activities often involve coordination among multiple business, legal, and operational functions, which may increase the time required. Burden estimates could be further enhanced by accounting for differences in institution size, product offerings, and organizational structure.

The clarity and usefulness of the information collection could be enhanced through several improvements. The provision of model disclosure templates could promote greater uniformity across institutions and reduce the potential for consumer confusion. Additional guidance regarding the presentation of multi-tier annual percentage yield (APY) structures and variable-rate accounts could further improve consumer understanding of account terms. Updating existing guidance to address digital delivery methods and advertising practices would better reflect current technologies and consumer communication channels. In addition, clarifying expectations related to online statements and mobile-friendly formats could help ensure greater consistency in disclosures across institutions.

Lastly, to reduce unnecessary operational burdens while continuing to support compliance objectives, the CFPB could consider targeted modifications to existing recordkeeping and disclosure practices. For example, permitting financial institutions to rely exclusively on electronic record-retention systems without requiring paper backups could streamline operations. Accepting system-generated logs as adequate evidence of disclosure delivery or consumer access could further reduce duplicative documentation. Aligning required data elements with standard core system outputs would help minimize manual data entry and redundant reporting. Additionally, allowing batch change-in-terms notifications for institution-wide updates, in lieu of individualized processes, could reduce operational complexity while maintaining effective consumer communication.

Once again, thank you for the opportunity to comment on the CFPB's information collection activities around Truth in Savings (Regulation DD). Please feel free to contact us for any further discussion.



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