



February 9, 2026

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

RE: Mortgage Acts and Practices-Advertising (Regulation N)
OMB Control Number: 3170-0009
Docket No. CFPB-2025-0043

To Whom It May Concern:

We are writing in response to the Consumer Financial Protection Bureau (CFPB) request for comment on Mortgage Acts and Practices-Advertising (Regulation N) 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 Consumer Financial Protection Bureau (CFPB) regarding its request for comment on Mortgage Acts and Practices-Advertising (Regulation N).

The Credit Union supports the CFPB's determination that Regulation N's record retention requirements are necessary, provide practical supervisory value, and promote consumer protection. However, given the breadth of marketing channels currently in use, the collection and maintenance of records across a 24-month period may not be feasible in all cases. A shorter retention timeframe could be more realistic and operationally manageable while still meeting supervisory objectives.

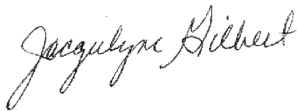
The Credit Union appreciates the CFPB's ongoing efforts to assess the compliance impacts associated with the Mortgage Acts and Practices-Advertising (Regulation N) recordkeeping requirements and recognizes that the level of effort required may vary based on institutional size, advertising channels, reliance on third-party vendors, and the volume of digital content. Continued engagement with industry stakeholders would further support the CFPB's evaluation of compliance impacts across diverse business models.

The quality and effectiveness of retained records could be enhanced through additional guidance clarifying the application of existing Regulation N standards to digital and dynamic mortgage advertising. This guidance could include examples of what constitutes “materially different” content, as well as clarification regarding acceptable record formats. Clear confirmation that records maintained for other regulatory, legal, or business purposes may satisfy Regulation N requirements-provided they are readily retrievable, would further promote consistency and effective supervision.

The Credit Union also supports continued recognition of electronic and automated record retention practices and encourages the CFPB to affirm the use of centralized content management systems, automated archiving and logging tools, metadata-based retention methods, and appropriate reliance on third-party vendor platforms where records can be accessed upon request. Additional clarification regarding the use of representative sampling for high-volume, substantially similar advertisements and the application of risk-based documentation approaches would help minimize unnecessary compliance burden while preserving strong consumer protections.

Once again, thank you for the opportunity to comment on the CFPB’s information collection activities around Mortgage Acts and Practices – Advertising (Regulation N). Please feel free to contact us for any further discussion.

Sincerely,

A handwritten signature in cursive script that reads "Jacquelyne Gilbert".

Jacquelyne Gilbert
SVP/Chief Risk Officer
Suncoast Credit Union