



LOS ANGELES COUNTY  
**CONSUMER & BUSINESS AFFAIRS**

Board of Supervisors

January 17, 2023

Hilda L. Solis  
First District

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Fifth District

Araceli Dyson  
Department of Financial Protection and Innovation  
2101 Arena Boulevard  
Sacramento, California 95834  
[regulations@dfpi.ca.gov](mailto:regulations@dfpi.ca.gov)

Dear Ms. Dyson:

**Notice of Modification to Proposed Rulemaking (PRO 03-21) California  
Department of Financial Protection and Innovation – SUPPORT**

Director

Rafael Carbajal

Chief of Staff  
Joel Ayala

The County of Los Angeles (County) Department of Consumer and Business Affairs (DCBA) supports the Department of Financial Protection and Innovation’s (DFPI) Notice of Modification to Proposed Rulemaking (PRO 03-21).

The proposed rules indicate that covered persons must establish reasonable procedures to respond to consumer complaints and inquiries in a timely manner, including requiring that complaint procedures be in place, that complaint forms both in paper and electronic format are made available online, required record keeping and reporting, required dedicated complaint phone number with live representatives, restrictions on statutes of limitations for complaints less than four years, and requirements to provide contracts to clients in the language used during negotiation.

DCBA fully supports these rules as we share a similar commitment to consumer protections and dispute resolution. These rules will provide constituents another opportunity to resolve their disputes while increasing accountability for this industry. An effective consumer complaint process and the increased transparency is a valuable tool for consumer protection agencies to identify trends and risks of consumer harm, compliance management program deficiencies, and customer service issues. Additionally, these rules provide an opportunity for the lending agent to monitor their operations and detect indicators of possible weaknesses in processes and controls which could lead to less legal liability and ultimately long-term cost savings.

Sincerely,



Rafael Carbajal  
Director



[dcba.lacounty.gov](http://dcba.lacounty.gov)  
[info@dcba.lacounty.gov](mailto:info@dcba.lacounty.gov)

320 W. Temple St., Room G-10, Los Angeles CA, 90012-2706

[Redacted] · [Redacted] · Fax: [Redacted]