



April 7, 2023

Ms. Clothilde V. Hewlett
Commissioner, Department of Financial Protection and Innovation
2101 Arena Blvd.
Sacramento, CA 95834
Submitted electronically to regulations@dfpi.ca.gov

Re: PRO-03-21

Dear Commissioner Hewlett,

The undersigned organizations have reviewed the Second Proposed Modifications to Proposed Text in this rulemaking, and appreciate the Department’s adoption of several of our suggested changes to the Proposed Modifications to Proposed Text. In particular, we applaud the Department for strengthening the duties imposed on an “officer” in section 1072(f); the requirements for customer service hours for accepting oral complaints in section 1072(c)(3); the language access requirements in section 1072(c)(4); and the litigation-related exemption to a “complaint” in section 1071(a)(1)(H). We continue to urge the Department to adopt our suggestions for the complaint processing timelines in section 1072(g) and the geographic limitations on who qualifies as a “complainant” in section 1071(b). Regardless, the Department’s most recent changes have significantly improved these crucial rules, which will play an important role in ensuring that covered persons provide an effective complaint-review and -resolution process for consumers. We appreciate the Department’s careful attention to this rulemaking process.

If any further information would be useful, please contact Andrew Kushner at andrew.kushner@responsiblelending.org, 510.379.5513.

Very truly yours,

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