



July 18, 2025

VIA ELECTRONIC SUBMISSION

The Honorable Russell Vought
Acting Director
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

**Re: Small Business Lending Under the Equal Credit Opportunity Act (Regulation B);
Extension of Compliance Dates, Docket No. CFPB-2025-0017, RIN 3170-AB40**

Dear Acting Director Vought:

On June 18, 2025, the Consumer Financial Protection Bureau (CFPB) published an interim final rule (IFR) on the *Small Business Lending Under the Equal Credit Opportunity Act (Regulation B); Extension of Compliance Dates*.¹ The IFR would extend the three-tiered compliance dates² under the 2023 *Small Business Lending Under the Equal Credit Opportunity Act (Regulation B)* final rule (2023 Final Rule) by one year, to begin in July 2026 instead of July 2025. This letter constitutes the Office of Advocacy's (Advocacy) public comments on the IFR.

Advocacy previously commented on the notice of proposed rulemaking (NPRM) on *Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B)* in January 2022, and we stated that "the CFPB's approach may be unnecessarily burdensome to small entities, may impact the cost of credit for small businesses[,] and may lead to a decrease in lending to small, minority- and women-owned businesses."³ The 2023 final rule did not alleviate our concerns.

¹ 90 Fed. Reg. 25,874 (June 18, 2025).

² The three-tiered compliance deadline in the 2023 final rule gave entities originating at least 2,500 covered transactions in the preceding two years until October 1, 2024 to comply, entities originating at least 500 covered credit transactions until April 1, 2025 to comply, and entities originating at least 100 covered credit transactions until January 1, 2026 to comply. *See* 88 Fed. Reg. 35,533. The 2024 interim final rule extended the compliance date in each tier in the three-tiered compliance period by 290 days. *See* 89 Fed. Reg. 55024.

³ U.S. Small Bus. Admin., Off. of Advoc., Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 6, 2022), <https://advocacy.sba.gov/2022/01/20/advocacy-submits-response-to-cfpbs-notice-of-proposed-rulemaking-on-small-business-lending-data-collection>.

While Advocacy recognizes the importance of the goals in the 2023 final rule to provide more robust and granular data on small business credit applications, Advocacy remains concerned with the CFPB's approach. Advocacy commends the CFPB for issuing this IFR to give small entities more time to comply with the Small Business Lending rule requirements, which will benefit nearly one million small businesses with cost savings of \$48.5 million in present value discounted at 7%.⁴ However, given the other issues we have previously raised with the rule, Advocacy encourages the CFPB to rescind the 2023 final rule or modify the rule to address Advocacy's small business concerns.

I. Background

A. The Office of Advocacy

Congress established the Office of Advocacy under Pub. L. 94-305 to represent the views of small entities before federal agencies and Congress. Advocacy is an independent office within the U.S. Small Business Administration (SBA) that seeks to ensure small business concerns are heard in the federal regulatory process. Advocacy also works to ensure that regulations do not unduly inhibit the ability of small entities to compete, innovate, or comply with federal laws. The views expressed by Advocacy do not necessarily reflect the views of the SBA or the Administration.

The Regulatory Flexibility Act (RFA),⁵ as amended by the Small Business Regulatory Enforcement Fairness Act (SBREFA),⁶ gives small entities a voice in the rulemaking process. For all rules that are expected to have a significant economic impact on a substantial number of small entities, the RFA requires federal agencies to assess the impact of the proposed rule on small entities and to consider less burdensome alternatives.⁷ Additionally, section 609 of the RFA requires the Consumer Financial Protection Bureau, the Occupational Safety and Health Administration, and the Environmental Protection Agency to conduct special outreach efforts through a review panel.⁸ The panel must carefully consider the views of the impacted small entities, assess the impact of the proposed rule on small entities, and consider less burdensome alternatives for small entities.⁹ If a rule is not expected to have a significant economic impact on a substantial number of small entities, agencies may certify it as such and submit a statement of the factual basis to Advocacy for such a determination that adequately supports its certification.¹⁰

The Small Business Jobs Act of 2010 requires agencies to give every appropriate consideration to comments provided by Advocacy.¹¹ The agency must include a response to these written

⁴ Advocacy estimates using data from the 2023 Final Rule.

⁵ Pub. L. No. 96-354, 94 Stat. 1164 (1980) (codified at 5 U.S.C. §§ 601-612).

⁶ Pub. L. No. 104-121, tit. II, 110 Stat. 857 (1996) (codified in scattered sections of 5 U.S.C. §§601-612).

⁷ 5 U.S.C. § 603.

⁸ *Id.* § 609.

⁹ *Id.*

¹⁰ *Id.* § 605(b).

¹¹ Small Business Jobs Act of 2010, Pub. L. No. 111-240, §1601, 214 Stat. 2551 (codified at 5 U.S.C. § 604).

comments in any explanation or discussion accompanying the final rule’s publication in the Federal Register, unless the agency certifies that the public interest is not served by doing so.¹²

Advocacy’s comments are consistent with Congressional intent underlying the RFA, that “[w]hen adopting regulations to protect the health, safety, and economic welfare of the nation, federal agencies should seek to achieve statutory goals as effectively and efficiently as possible without imposing unnecessary burdens on the public.”¹³

B. The 2021 Proposed Rule

On October 8, 2021, the CFPB published a notice of proposed rulemaking (NPRM) in the Federal Register on the *Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B)*¹⁴ to implement changes to the Equal Credit Opportunity Act (ECOA) made by section 1071 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).¹⁵ The 2021 proposed rule would require covered financial institutions (i.e., financial institutions that originated at least 25 covered credit transactions for small businesses in each of the two preceding calendar years) to collect and report data on small business applications for covered credit transactions (i.e., loans, lines of credit, credit cards, and merchant cash advances).

The CFPB convened a Small Business Review Panel in October 2020, pursuant to Section 609 of the Regulatory Flexibility Act,¹⁶ and conducted virtual outreach meetings with small entity representatives (SERs) from 20 small businesses between October 19 and October 22, 2020.¹⁷ The SERs participated in conversations with the CFPB, discussed selected portions of the rule proposal under consideration, and submitted written feedback to the CFPB. A number of those comments are discussed below and were included in Advocacy’s 2022 public comment letter.¹⁸

The data to be collected under the proposed rule included 13 statutorily required data points (e.g., the race, sex, and ethnicity of the principal owners of the business, the amount of the credit limit applied for, and the type and purpose of the loan)¹⁹ and 68 other discretionary data points determined by the CFPB. The CFPB relied on a provision of the statute that allows the CFPB to collect “any additional data that the Bureau determines would aid in fulfilling the purposes of this section.”²⁰ The proposed discretionary data points included pricing information, such as the interest rate and the total origination charge for the credit transaction, the applicant’s number of

¹² *Id.*

¹³ Regulatory Flexibility Act, Pub. L. No. 96-354, 94 Stat. 1164 (1980) (codified at 5 U.S.C. §§ 601-612).

¹⁴ 86 Fed. Reg. 56,356 (Oct. 8, 2021).

¹⁵ See Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203, § 1071 (2010) (codified at 15 U.S.C. § 1691c-2).

¹⁶ 5 U.S.C. § 609.

¹⁷ CONSUMER FIN. PROT. BUREAU, FINAL REPORT OF THE SMALL BUSINESS REVIEW PANEL ON THE CFPB’S PROPOSALS UNDER CONSIDERATION FOR THE SMALL BUSINESS LENDING DATA COLLECTION RULEMAKING (Dec. 14, 2020), https://files.consumerfinance.gov/f/documents/cfpb_1071-sbrefa-report.pdf.

¹⁸ See *U.S. Small Bus. Admin., Off. of Advoc.*, *supra* note 3.

¹⁹ See 15 U.S.C. § 1691c-2; 86 Fed. Reg. 56,557.

²⁰ 15 U.S.C. § 1691c-2(e)(2).

workers, and the applicant's census tract.²¹ One SER stated that the costs of the discretionary data points would be "significant," while another SER stated that the CFPB should include as few discretionary data points as possible.²² Another SER said the CFPB should avoid adding any discretionary data points and finalize the rule with just the statutorily required data points.²³ Several public commenters agreed with either narrowing the number of discretionary data points or not including any.²⁴

Generally, the 2021 proposed rule failed to address the concerns raised by SERs. For example, the proposed rule imposed an 18-month delayed compliance period instead of the 24 months discussed in the Small Business Review Panel to compromise between a majority of SERs who wanted 24 months and a few who wanted 12 months. The CFPB also proposed requiring a strict "firewall" between a covered financial institution's employees to prevent certain demographic data from being shared with underwriters despite many SERs suggesting it would be difficult to implement. However, the CFPB's proposed alternative size standard of \$5 million or less in gross annual revenue for the definition of small business was acceptable to several SERs.

The CFPB estimated that of the nearly 5,000 covered financial institutions affected by the rule, nearly 3,400 are small, and depository institutions account for nearly 80 percent of the small covered financial institutions.²⁵ For these small affected entities, the CFPB determined that the proposed rule would impose one-time costs ranging from \$44,500 to \$95,200 (depending on the complexity of compliance operations) with an overall market impact of between \$143 and \$153 million for depository institutions and \$63 million for non-depository institutions.²⁶ Projected ongoing costs ranged from \$7,386 to \$243,266 per year (depending on the complexity of compliance operations) with an overall market impact of \$112 to \$126 million annually.²⁷

In Advocacy's January 2022 public comment letter,²⁸ Advocacy asserted that CFPB may have underestimated the costs, specifically related to training on new software, implementing new forms and applications, and creating new policies and procedures. Advocacy also encouraged the CFPB to analyze a loan origination threshold higher than 25, such as 200 or 500 originations, to determine a threshold that produces a meaningful amount of data while limiting the burden on small entities. Advocacy also expressed concern with the discretionary data points and suggested

²¹ See 86 Fed. Reg. at 56,578.

²² CONSUMER FIN. PROT. BUREAU, *supra* note 17 at 30.

²³ *Id.*

²⁴ See e.g., Conf. of State Bank Supervisors, Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 6, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-1435>; Montgomery Bank, Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 5, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-0925>; Wis. Credit Union League, Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 6, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-1330>.

²⁵ 86 Fed. Reg. at 56,569.

²⁶ *Id.* at 56,571.

²⁷ *Id.*

²⁸ *Supra* note 3.

that a less costly alternative would be to limit the collection of data to the statutorily required data points.

C. The 2023 Final Rule and Subsequent Litigation

On May 31, 2023, the CFPB published the final rule in the Federal Register on the *Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B)*²⁹ with the first tier of the three-tiered compliance dates beginning in October 2024.³⁰ The 2023 final rule took into account some of the comments raised in response to the NPRM. For example, it increased the threshold for covered financial institutions from 25 covered credit transactions for small businesses in each of the two preceding calendar years to 100 covered credit transactions in each of the preceding calendar years. However, many of the discretionary data points from the 2021 proposed rule remained in the 2023 final rule, which means significant concerns with compliance costs and undue burden from the proposed rule persist.

With the larger credit transaction threshold, the CFPB estimated that of the more than 2,500 covered financial institutions affected by the rule, nearly 1,500 are small, with depository institutions accounting for nearly 70 percent of the small covered financial institutions.³¹ For these small affected entities, the CFPB determined that the final rule would impose one-time costs ranging from \$49,225 to \$105,250 (depending on the complexity of compliance operations) with an overall market impact of between \$56 and \$67 million for depository institutions and \$45 million for non-depository institutions.³² Projected ongoing costs ranged from \$8,349 to \$278,618 per year (depending on the complexity of compliance operations) with an overall market impact of \$83 to \$96 million annually.³³

Less than one month after the CFPB issued the 2023 final rule, litigants challenged the regulation. In July 2024, the CFPB extended the three-tiered compliance period by 290 days to conform to an order by the U.S. District Court for the Southern District of Texas to extend the compliance period.³⁴ The CFPB's interim final rule extending the compliance period took effect on August 2, 2024 and postponed the compliance periods to July 2025, January 2026, and October 2026 for the highest, moderate, and smallest volume lenders, respectively.³⁵

Courts have since stayed the 2023 final rule's compliance period even further for some market participants in three separate cases filed by lenders. The U.S. Court of Appeals for the Fifth Circuit stayed the rule and delayed the compliance deadlines for plaintiffs and intervenors in the

²⁹ 88 Fed. Reg. 35,150 (May 31, 2023).

³⁰ The CFPB scrapped the 18-month compliance deadline for all entities in favor of a three-tiered compliance deadline with entities originating at least 2,500 covered transactions in the preceding two years required to comply by October 1, 2024, followed by entities originating at least 500 covered credit transactions required to comply by April 1, 2025, and entities originating at least 100 covered credit transactions required to comply by January 1, 2026. *See* 88 Fed. Reg. 35,533.

³¹ *Id.* at 35,522.

³² *Id.* at 35,524.

³³ *Id.*

³⁴ *See* Texas Bankers Ass'n, v. CFPB, No. 7:23-cv-00144 (S.D. Tex. July 31, 2023).

³⁵ 89 Fed. Reg. 55,024.

Texas Bankers' litigation, the U.S. District Court for the Eastern District of Kentucky stayed the rule in the *Monticello Banking Co.* case, and the U.S. District for the Southern District of Florida granted a stay of the rule and delayed the compliance for plaintiff members in the *Revenue Based Finance Coalition* case.³⁶ However, because these stays and delaying of compliance deadlines only apply to parties to each respective lawsuit, financial institutions not represented in these lawsuits are legally required to comply. This IFR will extend the compliance deadlines for all financial institutions not subject to the stays until courts or the CFPB have an opportunity to finally weigh in.

II. Advocacy's Tempered Support for the Interim Final Rule: The Interim Final Rule Will Provide Immediate Though Limited Benefit to Small Entities

With three different courts staying the final rule and delaying the compliance deadline for different plaintiffs, the current status of the rule is unclear for many small entities. Thus, the extension of the three-tiered compliance deadline will give small entities additional time to understand, prepare for, and comply with the complex reporting requirements. It will also allow time for the cases to run their course, which should result in the regulated community having greater certainty. Many small entities lack the dedicated compliance infrastructure necessary to begin collecting, storing, and reporting the required data. At least one financial institution commented on the NPRM that it does not currently use automated application systems, so all data would have to be collected manually.³⁷ This IFR will provide similarly situated small banks with more time to come into compliance.

The IFR also provides more time for outreach, education, and technical guidance from the CFPB, trade associations, and government partners. Small lenders are less likely to have the knowledge and resources for regulatory compliance, so giving more time for outreach and education will assist the regulated community. Furthermore, the additional time can be used by the CFPB to develop another rulemaking rescinding or modifying the 2023 final rule to address the concerns raised below.

By extending the compliance deadline, both small banks and small business loan applicants will see a burden reduction. For example, the one-year extension will allow 1,000 small banks to delay upfront costs to come into compliance with the regulation and avoid one year of ongoing costs. These changes will allow each bank to save \$1,558 in annualized cost savings over the next ten years (present value of \$10,939). For all small banks, the annualized cost savings will be \$1.6 million (present value of \$10.9 million). For small business loan applicants, the savings are expected to be \$5.9 million per year over the next ten years (present value of \$41.5 million). In

³⁶ See *Texas Bankers Ass'n v. CFPB*, No. 24-40705 (5th Cir. Feb. 2, 2025); *Monticello Banking Co. v. CFPB*, No. 6:23-cv-00148-KKC (E.D. Ky. Mar. 11, 2025); *Revenue Based Finance Coalition v. CFPB et al.*, No. 1:23-cv-24882-DSL (S.D. Fla. May 6, 2025).

³⁷ Forte Bank, Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 5, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-1343>.

sum, Advocacy estimates that this nearly twelve-month compliance date extension will benefit 981,000 small businesses with cost savings of \$48.5 million in present value discounted at 7%.³⁸

III. Advocacy's Small Business Concerns with the 2023 Final Rule

Advocacy has three chief concerns with the 2023 final rule. Based on feedback from financial institution trade groups, SERs during the Small Business Review Panel, and publicly filed comments, Advocacy believes the costs to small entities are not fully captured in the final rule. Advocacy also believes that the number of data points to be collected, many of which are discretionary, imposes an undue burden on small entities. Finally, Advocacy believes the uncertainty around which applicant-level data points will be publicly disclosed poses privacy concerns to small business loan applicants.

A. The Costs to Small Entities Are Not Fully Captured in the Final Rule

The CFPB stated in its NPRM that one-time costs for small entities would range from \$44,500 to \$95,200 (depending on the complexity of compliance operations) with an overall market impact of between \$143 and \$153 million for depository institutions and \$63 million for non-depository institutions. Additionally, the CFPB projected that ongoing costs for small entities would range from \$7,386 to \$243,266 per year (depending on the complexity of compliance operations) with an overall market impact of \$112 to \$126 million annually.³⁹ In the final rule, accounting for increasing the reporting threshold to 100 loan originations (rather than the 25 origination threshold in the NPRM), the CFPB adjusted its estimate to reflect that one-time costs for small entities would range from \$49,225 to \$91,075 (depending on the complexity of compliance operations) with an overall market impact of between \$56 and \$67 million for depository institutions and \$45 million for non-depository institutions. The CFPB projected ongoing costs for small entities would range from \$8,349 to \$278,618 (depending on the complexity of the compliance operations) with an overall market impact of between \$83 and \$96 million.⁴⁰ The CFPB made these changes in response to comments at the NPRM stage, and the total estimated impacts were reduced. However, the CFPB did not include various other cost factors that were also raised in the comments, which would have resulted in higher estimated costs. Therefore, the CFPB's adjusted estimates give the impression that the burden of the rule was dramatically reduced when the true reduction in cost impacts was likely much smaller.

The CFPB estimated that the total expected annual ongoing costs for small entities would amount to between \$46 and \$100 per application processed.⁴¹ These estimates did not account for comments raised regarding staff time, training, implementing new processes, and other impacts. Assuming the commenters' estimated impacts are accurate, the true costs to small entities of the 2023 final rule are likely even higher than the CFPB's per application processed estimates.

³⁸ *Supra* note 4.

³⁹ *Supra* notes 25-26.

⁴⁰ 88 Fed. Reg. at 35,524.

⁴¹ 88 Fed. Reg. at 35,510.

Even after the CFPB doubled the amount of assumed training hours required to train loan officers,⁴² Advocacy believes the CFPB is still not accounting for the true costs associated with the rule. In addition to rule familiarization, training, new equipment, and the development of new policies and procedures, many financial institutions will have to hire additional staff. While the CFPB calculated the number of full-time equivalent staff based on the number of applications per year,⁴³ commenters cited even higher numbers. One financial institution in Iowa claimed that CFPB's estimated staff hours and non-salary expense "to be grossly underestimated especially related to training."⁴⁴ Furthermore, according to a survey of independent community banks, "roughly 1 in 5 community banks expect recurring costs to be at least double CFPB's highest estimate."⁴⁵

The CFPB did not account for the data raised by small entities in the APA comment process. Advocacy believes that CFPB should consider comments raised by small entities to be real, and that those impacts demonstrate the regulation to be even more costly than estimated. Advocacy urges the CFPB to rescind or modify the rule based on the full extent of cost impacts imposed by the regulation.

B. The Discretionary Data Points Are Unduly Burdensome to Small Entities

Of the 81 data points required under the 2023 final rule, only 13 are statutorily required. The other 68 may require new reporting systems, which are likely still being developed. Several commenters stated that some of the discretionary data points required under the 2023 final rule are not currently collected, so this would require a change in their reporting forms and processes.⁴⁶ According to a survey conducted by the American Bankers Association, approximately one-third of community banks would have to purchase commercial loan origination software to comply.⁴⁷

Others commented that some of the discretionary data points are not related to creditworthiness (e.g., the applicant's number of workers and application method)⁴⁸ and are thus being collected for little benefit. Furthermore, some of the discretionary data points may be hard to collect. For example, demographic information of multiple owners, the gross annual revenue for certain small businesses, and the NAICS code may be challenging for a small business to accurately report.

⁴² 88 Fed. Reg. at 35,520.

⁴³ 88 Fed. Reg. at 35,500.

⁴⁴ State Bank & Trust Co., Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 5, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-1794>.

⁴⁵ Indep. Cmty. Bankers Ass'n, *Finding Balance: How Well-Intended Policies Hamper Small Business Lending and Undermin Relationship Banking* (June 2024), <https://www.icba.org/docs/default-source/icba/advocacy-documents/keybridge-survey-report.pdf>.

⁴⁶ See, e.g., *supra* note 37.

⁴⁷ American Bankers Ass'n., et. al, Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 6, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-1715>.

⁴⁸ *Infra.* note 50.

In addition to being burdensome to small entities, the discretionary data points are likely to elongate the process for applying for a loan and impose a burden on small business applicants, which will impose additional costs and may disincentivize applicants from seeking loans. More questions equal more time, and imposing 81 potential data fields might make applicants weary of filling out the loan application. Advocacy recommends that the 2023 final rule be rescinded or modified to remove the discretionary data points and limit the requirements to only those that are required by statute.

C. The Public Disclosure of Discretionary Data Point Data Risks Applicant Privacy

The 2023 final rule mandates the collection of numerous discretionary data points that pose serious privacy risks for small business lending applicants in small and rural markets. These data points, when combined, could uniquely identify individual applicants in small and rural market areas with few comparable businesses. As such, this risk of being identified through public disclosures of applicant-level loan data to small business owners may deter them from seeking credit.

The CFPB initially proposed to conduct a balancing test to weigh two competing interests: the public's interest in the data for monitoring fair lending practices and the privacy risks to applicants who may be identified through publicly disclosed data.⁴⁹ After receiving several comments from concerned stakeholders on the privacy risks with public disclosure of applicant-level data,⁵⁰ the CFPB rejected the balancing test and instead decided in the final rule that it would announce the methodology after it obtains a full year of reported 1071 data. In other words, an applicant cannot be certain that his or her applicant-level data will not be released until after a financial institution has already collected it. If discretionary data points are not rescinded from the regulation, Advocacy recommends the CFPB protect small business loan applicant privacy by only disclosing the minimum when applicant-level data is released.

IV. Conclusion

Advocacy commends the CFPB for issuing this IFR to give small entities more time to comply with the Small Business Lending requirements. However, Advocacy continues to have serious concerns with the 2023 final rule and encourages the CFPB to rescind or modify the rule accordingly.

If you have any questions or require additional information, please contact me or Assistant Chief Counsel Tanner L. Long at (202) 205-7085 or by email at Tanner.Long@sba.gov.

⁴⁹ See 86 Fed. Reg. 56,512.

⁵⁰ See Indep. Cmty. Bankers Ass'n., Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 6, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-1525>; Am. Bankers Ass'n., Comments on Small Business Lending Data Collection Under the Equal Credit Opportunity Act (Regulation B), Docket No. CFPB-2021-0015, RIN 3170-AA09 (Jan. 6, 2022), <https://www.regulations.gov/comment/CFPB-2021-0015-1715>.

Sincerely,

/s/

Chip Bishop
Deputy Chief Counsel
Office of Advocacy
U.S. Small Business Administration

/s/

Tanner L. Long
Assistant Chief Counsel
Office of Advocacy
U.S. Small Business Administration

Copy to: Mr. Jeffrey B. Clark, Sr., Acting Administrator
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