

Preemption Archive

Policy Analysis

Policy Briefs, Reports & Press Releases

- Press release: Supreme Court Decision (Michigan v Bay Mills Indian Community) Strikes Blow against Tribal Online Payday Lenders, May 29, 2014
- Banking Regulator Favors Banks Over Consumers, July 20, 2011
- Issue Brief: OCC Ignores Dodd-Frank Act's Repeal of 2004 Preemption Regulations, May 2011
- Press Release Criticizing Proposed OCC Preemption Rules, May 26, 2011
- Issue Brief: The Role of the States under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, Dec. 2010
- Restore the States' Traditional Role as "First Responder", White Paper and Press Release, 2009
- Statement: State on Cuomo v. Clearing House Supreme Court Fair Lending Preemption Decision, 2009
- Response to MBA Policy Paper on Suitability, February 2007

Letters

- Consumer Groups' Letter to Senate Opposing S. 1208 (Tester) — bill not protecting consumers in rent-to-own transactions, May 26, 2014
- Consumer Groups' Letter to Senate Opposing S. 881 (Landrieu) -- Unfair To Rent-to-Own Consumers, August 2011
- Consumer Groups' Letter to the House Opposing HR 1588 (Canseco) -- Unfair To Rent-to-Own Consumers, August 2011
- Letter to Obama Requesting Amendment of Preemption Executive Order, 2008
- Letter to Senate Banking Committee Regarding Bernanke Nomination, October 2005

Comments

- Comments to OCC opposing new fintech lending charter that would preempt state interest rates and other laws, Nov. 14, 2016
- Consumer comments to FDIC opposing rent-a-bank arrangements., Oct. 27, 2016
- Consumer comments to OCC on supporting responsible financial innovation (May 31, 2016): Full comments. Comments only. Exhibits only.
- Comments to OCC in connection with 10 year review of regulations under Economic Growth and Regulatory Paperwork Reduction Act, Sept. 2, 2014.
- Comments On Electronic Fund Transfers Intent To Make Determination of Effect on State Laws (Maine and Tennessee) (Gift Card Expiration Dates and Escheat Law), October 22, 2012
- Comments on the Consumer Financial Protection Bureau's Interim Final Rule on the preemption rules under the Alternative Mortgage Transaction Parity Act, September 22, 2011
- NCLC Comments on OCC Preemption Proposal, June 27, 2011
- Comments on OCC Interim Final Rule on preemption of state laws applied to federal savings associations that act as a fiduciary (including as a trustee, executor, administrator or guardian), Oct. 11, 2011
- Comments regarding Interstate Banking; Federal Interest Rate Authority: Proposed Rulemaking Federal Deposit Insurance Corporation, 2005
- Comments regarding the proposed amendments to Reg E on electronic debiting of NSF fees,

September 2006

- Comments – Request for Information on Electronic Benefits Transfer System for Victims of Disaster, April 2006
- Comments regarding the proposed amendments to Reg E on ATM disclosures, October 2005
- Comments regarding Petition for Rulemaking to Preempt Certain State Laws Federal Deposit Insurance Corporation, May 2005
- Comments regarding Proposed Amendment to Regulation J and Regulation CC Regarding Remotely Created Checks, May 2005
- Comments on Federal Check 21 Act: Banks No Longer Will Return Original Cancelled Checks, October 2004
- Comments regarding Economic Growth and Paperwork Reduction Act “EGRPRA”, April 2004
- Comments regarding the Proposed Revisions to Regulations B, E, M, Z, DD and the Official Staff Commentaries, January 2004
- Comments regarding the proposed rules on Customer Identification Programs for Banks, Savings Associations and Credit Union, January 2004
- Comments to the FRB on Bounce Protection Products, April 2003

Testimony

- Testimony of Margot F. Saunders before Subcommittee of the House Committee on Financial Services: Examining Rental Purchase Agreements and the Potential Role for Federal Regulation, July 26, 2011
- Testimony before the Senate Committee on Banking, Housing and Urban Affairs regarding Current Proposals Considered for Regulatory Relief Legislation, June 2005
- Testimony to the Subcommittee on Financial Institutions and Consumer Credit regarding “Helping Consumers Obtain the Credit They Deserve”, May 2005
- Testimony to the Senate Committee on Banking, Housing and Urban Affairs regarding All Current Proposals for Legislation on Financial Services Reform, June 2004