



**Americans for Financial Reform**  
1825 K St NW, Suite 210, Washington, DC, 20006  
202.263.4533

September 3, 2010

Hon. Gary Gensler, Chairman  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street NW  
Washington, DC 20581

Hon. Sheila Bair, Chairman  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street NW  
Washington, DC 20429

Hon. Ben Bernanke, Chairman  
Federal Reserve Board of Governors  
20<sup>th</sup> Street & Constitution Avenue NW  
Washington, DC 20551

Hon. John Walsh, Acting Comptroller  
Office the Comptroller of the Currency  
Administrator of National Banks  
Washington, DC 20219

Hon. Mary Schapiro, Chairman  
Securities and Exchange Commission  
100 F Street NE  
Washington, DC 20549

Hon. Timothy Geithner, Secretary  
Department of the Treasury  
1500 Pennsylvania Avenue NW  
Washington, DC 20220

*Re: Transparency in the implementation of the Dodd-Frank Wall Street Reform  
and Consumer Protection Act*

Dear Sir/Madam:

Americans for Financial Reform and the undersigned groups thank each of the agencies that have adopted a voluntary transparency policy for the implementation and rulemaking process for the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). For instance, the FDIC's transparency includes public roundtable discussions and disclosure of all meetings with private sector individuals—on a bi-weekly basis—in regard to the subject matter of the meeting and the name and affiliation of the individuals. Unfortunately, this policy only applies to senior officials of the FDIC and telephone calls and teleconference calls are excluded from the new transparency model. A significant amount of lobbying is done over the telephone to staff at all levels of an agency.

We urge those agencies that have yet to adopt a transparency policy to do so. Also, we encourage all agencies to adopt transparency measures that require disclosure of the details of all private meetings concerning implementation of the Dodd-Frank Act. Such disclosure should include all telephone calls and conference calls, and report the



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actions and positions advocated by lobbyists and other private sector individuals. Additionally, all materials submitted should be disclosed. This disclosure will allow all stakeholders the opportunity to evaluate and offer their views on specific proposals, aiding agencies in promulgating rules that will serve not just the banks and industry, but also the public at large. Adoption of such an open-door policy will enhance transparency and ensure greater public access to the implementation and rulemaking processes, similar to that which banks and other financial industry interests have long enjoyed.

The Dodd-Frank Act established the Financial Stability Oversight Council (FSOC) to ensure financial stability and promote market discipline and created the Consumer Financial Protection Bureau (CFPB) to protect consumers in the financial marketplace. We encourage the FSOC and CFPB to each adopt transparency measures requiring disclosure of all private meetings with lobbyists and other individuals from the private sector. This should be inclusive of telephone calls and conference calls, and the actions and positions advocated by lobbyists and other private sector individuals, as well as all materials submitted by them, as we have urged each of you to do within your own agencies.

Thank you for considering the Americans for Financial Reform position on these important issues. For more information, please contact Craig Mehall, Public Citizen, at 202-454-5151 or [cmehall@citizen.org](mailto:cmehall@citizen.org).

Sincerely,

Americans for Financial Reform



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**Following are the partners of Americans for Financial Reform.**

*All the organizations support the overall principles of AFR and are working for an accountable, fair and secure financial system. Not all of these organizations work on all of the issues covered by the coalition or have signed on to every statement.*

**National Organizations**

- [A New Way Forward](#)
- [AARP](#)
- [Accountable America](#)
- [Adler and Colvin](#)
- [AFL-CIO](#)
- [AFSCME](#)
- [Alliance For Justice](#)
- [American Family Voices](#)
- [American Income Life Insurance](#)
- [Americans for Democratic Action, Inc.](#)
- [Americans for Fairness in Lending](#)
- [American Sustainable Business Council](#)
- [Americans United for Change](#)
- [Business for Shared Prosperity](#)
- [Calvert Asset Management Company, Inc.](#)
- [Campaign for America's Future](#)
- [Campaign Money](#)
- [Center for Digital Democracy](#)
- [Center for Economic and Policy Research](#)
- [Center for Economic Progress](#)
- [Center for Responsible Lending](#)
- [Center for Justice and Democracy](#)
- [Center of Concern](#)
- [Change to Win](#)
- [Clean Yield Asset Management](#)
- [Coastal Enterprises Inc.](#)
- [Coffee Party](#)
- [Color of Change](#)
- [Common Cause](#)
- [Communications Workers of America](#)



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- [Community Development Transportation Lending Services](#)
- [Community Law Center](#)
- [Consumer Action](#)
- [Consumer Association Council](#)
- [Consumers for Auto Safety and Reliability](#)
- [Consumer Federation of America](#)
- [Consumer Watchdog](#)
- [Consumers Union](#)
- [Corporation for Enterprise Development](#)
- [CREDO](#)
- [CTW Investment Group](#)
- [Demos](#)
- [Economic Policy Institute](#)
- [Essential Action](#)
- [Green America](#)
- [Greenlining Institute](#)
- [Good Business International](#)
- [Help Is On the Way, Inc](#)
- [HNMA Funding](#)
- [Home Actions](#)
- [Housing Counseling Services](#)
- [Information Press](#)
- [Institute for Global Communications](#)
- [Institute for Policy Studies: Global Economy Project](#)
- [International Brotherhood of Teamsters](#)
- [Institute of Women's Policy Research](#)
- [Keystone Research Center](#)
- [Krull & Company](#)
- [Laborers' International Union of North America](#)
- [Lake Research Partners](#)
- [Lawyers' Committee for Civil Rights Under Law](#)
- [Leadership Conference on Civil Rights](#)
- [Main Street Brigade](#)
- [MoveOn.org Political Action](#)
- [NAACP](#)
- [NASCAT](#)
- [National Association of Consumer Advocates](#)
- [National Association of Investment Professionals](#)



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- [National Association of Neighborhoods](#)
- [National Coalition for Asian Pacific American Community Development](#)
- [National Community Reinvestment Coalition](#)
- [National Consumer Law Center \(on behalf of its low-income clients\)](#)
- [National Consumers League](#)
- [National Council of La Raza](#)
- [National Council of Womens Organizations](#)
- [National Fair Housing Alliance](#)
- [National Federation of Community Development Credit Unions](#)
- [National Housing Institute](#)
- [National Housing Trust](#)
- [National Housing Trust Community Development Fund](#)
- [National NeighborWorks Association](#)
- [National Peoples Action](#)
- [National Urban League](#)
- [National Workrights Institute](#)
- [Next Step](#)
- [OMB Watch](#)
- [Openleft.com](#)
- [Opportunity Finance Network](#)
- [Partners for the Common Good](#)
- [National People's Action \(NPA\)](#)
- [PICO](#)
- [Progress Now Action](#)
- [Progressive Future](#)
- [Progressive States Network](#)
- [Poverty and Race Research Action Council](#)
- [Public Citizen](#)
- [Responsible Endowments Coalition](#)
- [Sargent Shriver Center on Poverty Law](#)
- [Scam Victims United](#)
- [SEIU](#)
- [Sojourners](#)
- [State Voices](#)
- [Taxpayer's for Common Sense](#)
- [The Association for Housing and Neighborhood Development](#)
- [The Carrots and Sticks Project](#)
- [The Fuel Savers Club](#)
- [The Seminal](#)



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- [UNET](#)
- [Union Plus](#)
- [United for a Fair Economy](#)
- [U.S. PIRG](#)
- [Unitarian Universalist for a Just Economic Community](#)
- [United Food and Commercial Workers](#)
- [United States Student Association](#)
- [USAction](#)
- [Veris Wealth Partners](#)
- [Veterans Chamber of Commerce](#)
- [We The People Now](#)
- [Western States Center](#)
- [Woodstock Institute](#)
- [Working America](#)
- [World Business Academy](#)
- [World Privacy Forum](#)

### *State Organizations*

- [207 CCAG](#)
- [9 to 5, the National Association of Working Women \(CO\)](#)
- [AARP Rhode Island](#)
- [Alaska PIRG](#)
- [Alliance for a Better Minnesota](#)
- [Arizona PIRG](#)
- [Arizona Advocacy Network](#)
- [Arizona Consumers Council](#)
- [Arizonans for Responsible Lending](#)
- [Arkansas Community Organizations](#)
- [Arkansas Public Policy Panel](#)
- [Association for Neighborhood and Housing Development \(NY\)](#)
- [Audubon Partnership for Economic Development LDC \(New York, NY\)](#)
- [Aurora NAACP \(Aurora, Colorado\)](#)
- [BAC Funding Consortium Inc. \(Miami, FL\)](#)
- [Beech Capital Venture Corporation \(Philadelphia, PA\)](#)
- [Bell Policy Center \(CO\)](#)
- [California PIRG](#)
- [California Reinvestment Coalition](#)



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- [Center for Media and Democracy](#)
- [Center for NYC Neighborhoods](#)
- [Century Housing Corporation \(Culver City, CA\)](#)
- [Changer\(NY\)](#)
- [Chautauqua Home Rehabilitation and Improvement Corporation \(NY\)](#)
- [Chicago Community Loan Fund \(Chicago, IL\)](#)
- [Chicago Community Ventures \(Chicago, IL\)](#)
- [Chicago Consumer Coalition](#)
- [Citizen Potawatomi CDC \(Shawnee, OK\)](#)
- [Club Change of Martin County \(Florida\)](#)
- [Coalition on Homeless Housing in Ohio](#)
- [Coffee Party – Central Ohio](#)
- [Coffee Party – Pensacola, Florida Chapter](#)
- [Coffee Party – New York City, Union Square Chapter](#)
- [Colorado AFL-CIO](#)
- [Colorado Center on Law and Policy](#)
- [Colorado Immigrant Rights Coalition](#)
- [Colorado PIRG](#)
- [Colorado Springs NAACP](#)
- [Community Action of Nebraska](#)
- [Community Capital Development](#)
- [Community Capital Fund \(Bridgeport, CT\)](#)
- [Community Capital of Maryland \(Baltimore, MD\)](#)
- [Community Development Financial Institution of the Tohono O’odham Nation \(Sells, AZ\)](#)
- [Community Redevelopment Loan and Investment Fund, \(Atlanta, GA\)](#)
- [Community Reinvestment Association of North Carolina](#)
- [Community Resource Group \(Fayetteville, AR\)](#)
- [Connecticut Association for Human Services](#)
- [Connecticut Citizen Action Group](#)
- [Connecticut PIRG](#)
- [Consumer Assistance Council](#)
- [Cooper Square Committee \(New York, NY\)](#)
- [Cooperative Fund of New England \(Wilmington, NC\)](#)
- [Corporacion de Desarrollo Economico de Ceiba \(Ceiba, PR\)](#)
- [CWA 7777 \(CO\)](#)
- [Delta Foundation, Inc. \(Greenville, MS\)](#)
- [Economic Opportunity Fund \(EOF\) \(Philadelphia, PA\)](#)
- [Empire Justice Center \(NY\)](#)



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- [Enterprises, Inc., Berea KY](#)
- [Fair Housing Contact Service OH](#)
- [Federation of Appalachian Housing Enterprises, Inc. \(Berea, KY\)](#)
- [Fitness and Praise Youth Development, Inc. \(Baton Rouge, LA\)](#)
- [Florida Consumer Action Network](#)
- [Florida PIRG](#)
- [Forward Community Investments \(Madison, WI\)](#)
- [Funding Partners for Housing Solutions \(Ft. Collins, CO\)](#)
- [Georgia PIRG](#)
- [Grow Iowa Foundation \(Greenfield, IA\)](#)
- [Homewise, Inc. \(Santa Fe, NM\)](#)
- [Humanitas Community Development Corporation \(TX\)](#)
- [Idaho Chapter, National Association of Social Workers](#)
- [Idaho Community Action Network](#)
- [Idaho Nevada CDFI \(Pocatello, ID\)](#)
- [Illinois PIRG](#)
- [Impact Capital \(Seattle, WA\)](#)
- [Indiana PIRG](#)
- [Indiana University PIRG](#)
- [Information Press \(CA\)](#)
- [Iowa PIRG](#)
- [Iowa Citizen Action Network](#)
- [Iowa Citizens for Community Improvement](#)
- [JobStart Chautauqua, Inc. \(Mayville, NY\)](#)
- [Keystone Research Center \(PA\)](#)
- [La Casa Federal Credit Union \(Newark, NJ\)](#)
- [Low Income Investment Fund \(San Francisco, CA\)](#)
- [Long Island Housing Services NY](#)
- [MaineStream Finance \(Bangor, ME\)](#)
- [Mandelman Matters](#)
- [Maryland PIRG](#)
- [Massachusetts Consumers' Coalition](#)
- [Massachusetts Fair Housing Center](#)
- [MASSPIRG](#)
- [Michigan PIRG](#)
- [Midland Community Development Corporation \(Midland, TX\)](#)
- [Midwest Minnesota Community Development Corporation \(Detroit Lakes, MN\)](#)
- [Mile High Community Loan Fund \(Denver, CO\)](#)





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- [Montana Community Development Corporation \(Missoula, MT\)](#)
- [Montana PIRG](#)
- [Mortgage Recovery Service Center of L.A.](#)
- [Neighborhood Economic Development Advocacy Project](#)
- [New Hampshire PIRG](#)
- [New Jersey Community Capital \(Trenton, NJ\)](#)
- [New Jersey Citizen Action](#)
- [New Jersey PIRG](#)
- [New Life Evangelistic Center](#)
- [New Mexico PIRG](#)
- [New York PIRG](#)
- [New York City AIDS Housing Network](#)
- [Next Step \(MN\)](#)
- [NOAH Community Development Fund, Inc. \(Boston, MA\)](#)
- [Nonprofit Finance Fund \(New York, NY\)](#)
- [Nonprofits Assistance Fund \(Minneapolis, MN\)](#)
- [North Carolina Association of Community Development Corporations](#)
- [North Carolina PIRG](#)
- [Northern Community Investment Corporation \(St. Johnsbury, VT\)](#)
- [Northside Community Development Fund \(Pittsburgh, PA\)](#)
- [Ohio Capital Corporation for Housing \(Columbus, OH\)](#)
- [Ohio PIRG](#)
- [Oregon State PIRG](#)
- [Our Oregon](#)
- [PennPIRG](#)
- [Piedmont Housing Alliance \(Charlottesville, VA\)](#)
- [Progressive Agenda Now \(Chicago, IL\)](#)
- [Rhode Island PIRG](#)
- [Rights for all People \(Colorado\)](#)
- [The Rocky Mountain Peace and Justice Center \(Colorado\)](#)
- [Rural Community Assistance Corporation \(West Sacramento, CA\)](#)
- [Rural Organizing Project OR](#)
- [San Francisco Metropolitan Transportation Authority](#)
- [Santa Fe Neighborhood Law Center \(NM\)](#)
- [Seattle Economic Development Fund dba Community Capital Development](#)
- [SEIU Local 105 \(Colorado\)](#)
- [SEIU Rhode Island](#)



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- Southern Bancorp (Arkadelphia, AR)
- TexPIRG
- The Association for Housing and Neighborhood Development
- The Fair Housing Council of Central New York
- The Help Network
- The Loan Fund (Albuquerque, NM)
- Third Reconstruction Institute (NC)
- V-Family, Inc.
- Vermont PIRG
- Village Capital Corporation (Cleveland, OH)
- Virginia Citizens Consumer Council
- Virginia Poverty Law Center
- War on Poverty – Florida
- Washington Community Action Network
- WashPIRG
- Westchester Residential Opportunities Inc. NY
- Wigamig Owners Loan Fund, Inc. (Lac du Flambeau, WI)
- WISPIRG

### *Businesses*

- Blu
- Bowden-Gill Environmental
- Community MedPAC
- Diversified Env. Planning
- Hayden & Craig, PLLC
- The Holographic Repatterning Institute at Austin
- Mid City Animal Hospital (Phoenix, AZ)
- UNET