

March 20, 2020

By Electronic Submission

Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

Office of the Comptroller of the Currency  
400 7<sup>th</sup> Street, SW  
Washington, DC 20219

Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20520

Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Consumer Financial Protection Bureau  
1700 G Street, NW  
Washington, DC 20552

Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW  
Washington, DC 20410

Commodity Futures Trading Commission  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Small Business Administration  
409 3<sup>rd</sup> Street, SW  
Washington, DC 20416

Office of Information and Regulatory Affairs  
The Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Re: Request for 90-Day Tolling (Extension) of Public Comment Periods During the COVID-19 Pandemic

Dear Madam or Sir:

The emerging COVID-19 pandemic poses substantial threats to public health, imperils the health and life of many people in the United States, and significantly disrupts daily life, impacts that will likely persist for months. The undersigned organizations respectfully request an across-the-board extension (tolling) of public comment periods for a minimum of 90 days for all pending requests for information, notices under the Paperwork Reduction Act, notices of proposed rulemaking, and other releases seeking meaningful public comment. In addition, we request a public comment period of no less than 90 days for any such releases issued in the next three months. This request does not include items needed to respond to the crisis at hand.

Today, we are in a dramatically different world than when the agencies issued (or prepared to issue) these requests for public notice and comment. It is becoming increasingly obvious that additional time is needed to guarantee transparent and fair rulemaking processes with the meaningful public input that makes for regulatory actions that effectively and fairly accomplish statutory goals.

Effective and fair rules and other regulatory actions emerge from extensive engagement with the broad and diverse public impacted by the proposals. However, the spread of the dangerous COVID-19 and the unprecedented cautionary measures we are all taking to protect our families and communities have caused major unexpected disruptions in our lives and organizations. These disruptions present challenges to providing meaningful input within the current timeframes. We are aware that agencies

as well are grappling with the impacts of COVID-19 and may also need additional time to gather and process public input.

Additionally, the COVID-19 emergency has also had ripple effects throughout the financial system and has likely put the economy on a recessionary path. We are in a dramatically different economy than we were even a few weeks ago. Our organizations are focusing resources on policies and activities that would mitigate the impact of the unfolding financial and economic crisis, and this leaves little capacity for crafting appropriate comments on complex regulatory proposals that are not immediately relevant to the crisis.

For these reasons the undersigned organizations are requesting that all regulators publish a formal extension of no less than 90 days for any request for public comment closing its comment period in the next 90 days, with the exception of any rules necessary to respond to people's needs in this crisis or meet statutory deadlines. These timelines should be reevaluated as needed as the situation develops.

Thank you in advance for your consideration of this request; a prompt response will be appreciated as an aid to planning in a demanding time period.

Alaska PIRG	Interfaith Center on Corporate Responsibility
Allied Progress	International Brotherhood of Teamsters
American Federation of State, County and Municipal Employees (AFSCME)	Main Street Alliance
Americans for Financial Reform Education Fund	Massachusetts Communities Action Network
Association for Neighborhood and Housing Development (ANHD)	Montana Organizing Project
Beneficial State Foundation	NAACP
Better Markets	National Association of Consumer Advocates
Center for American Progress	National Community Reinvestment Coalition (NCRC)
Center for Community Progress	National Community Stabilization Trust
Center for NYC Neighborhoods	National Consumer Law Center (on behalf of its low income clients)
Coalition on Human Needs	National Fair Housing Alliance
Community Legal Services (Philadelphia, PA)	National Housing Resource Center
Connecticut Fair Housing Center	National Urban League
Consumer Action	New Jersey Citizen Action
Consumer Federation of America	New York Housing Conference
Democratic Treasurers Association	Oxfam America
Earth Ethics, Inc	Public Citizen
Economic Policy Institute	SC Appleseed Legal Justice Center
Empire Justice Center	Take on Wall Street
Financial Accountability and Corporate Transparency (FACT) Coalition	350 Butte County
Greenpeace USA	U.S. PIRG
Hope Enterprise Corporation	Veterans Education Success
Institute for Agriculture and Trade Policy	Virginia Organizing
	Woodstock Institute