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## Consumer Financial Services Outlook 2019: NPRM Reflections

Now that everyone has had a chance to read and digest the CFPB's collection Notice of Proposed Rulemaking (NPRM), it is time to respond to the Bureau's multiple comment requests. In this webinar, we'll share some of our thoughts and reflections on areas where additional clarification, comment, and revision may be warranted, including potential supporting arguments for the same. Topics will include:

- Expanding the limited content message proposal to be more effective
- Opportunities to clarify disclosure requirements
- Contouring the true impact of the proposed call frequency limitations
- Evaluating how "safe" the various proposed safe harbors may be, particularly given recent CFPB enforcement action regarding meaningful attorney involvement standards
- Evaluating where broader, first-party impacts appear most probable through UDAAP
- Assessing the substance of the new proposed validation form as well as the feasibility of providing it electronically or in a conversation with the debtor

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