



Innovative Payments Association

110 Chestnut Ridge Rd, Suite 111

Montvale, NJ 07645

btate@ipa.org

March 20, 2025

Submitted via E-Mail at: 2025-Emerging-Payments-Interpretive-Rule@cfpb.gov

Consumer Financial Protection Bureau

1700 G Street NW

Washington, DC 20552

Re: Electronic Fund Transfers Through Accounts Established Primarily for Personal, Family, or Household Purposes Using Emerging Payment Mechanisms
[CFPB-2025-0003]

To whom it may concern:

This letter is submitted to the Consumer Financial Protection Bureau (the “**CFPB**”) on behalf of the Innovative Payments Association (“**IPA**”),¹ in response to the proposed interpretive rule on Electronic Fund Transfers Through Accounts Established Primarily for Personal, Family, or Household Purposes Using Emerging Payment Mechanisms issued by the CFPB on January 10, 2025 and published in the Federal Register on January 15, 2025 (the “**Proposed Rule**”).² We appreciate the opportunity to provide feedback to the CFPB on this important topic. If you have questions about our comments, we would be happy to discuss them further.

The Proposed Rule would broadly expand the coverage of the Electronic Fund Transfer Act (“**EFTA**”) and Regulation E to cover cryptocurrencies and other digital assets, including credit card rewards points. Our members support strong protections for consumers including, where appropriate, through regulation. Our members are concerned, however, that the Proposed Rule is overly expansive and, as an interpretive rule, may have been issued without sufficient study, analysis, or stakeholder input.

Broadly expanding Regulation E coverage to cryptocurrencies and other digital assets will present complex challenges and could lead to negative outcomes for consumers, such as the removal of products like credit card rewards points from the marketplace. In addition, we note that the Proposed Rule was issued in January, right before a change in administration. Given the breadth and significant market impacts of the Proposed Rule, we believe the new administration should have an opportunity to review the proposal and determine whether or not to move forward. For these reasons, we request that the CFPB withdraw the Proposed Rule. If, after withdrawing the Proposed Rule, the CFPB desires to study the issue of expanding EFTA and Regulation E further, we would be happy to engage with you on that topic.

¹ The IPA is a trade organization that serves as the leading voice of the electronic payments sector, including prepaid products, mobile wallets, and person-to-person (P2P) technology for consumers, businesses and governments at all levels. The IPA’s goal is to encourage efficient use of electronic payments, cultivate financial inclusion through educating and empowering consumers, represent the industry before legislative and regulatory bodies, and provide thought leadership. The comments made in this letter do not necessarily represent the position of all members of the IPA.

² 90 Fed. Reg. 3723 (Jan. 15, 2025).



Innovative Payments Association

110 Chestnut Ridge Rd, Suite 111

Montvale, NJ 07645

btate@ipa.org

Again, we note that we are supportive of strong protections for consumers and caution that our recommendation for a withdrawal of the Proposed Rule is not an endorsement of any reduced or relaxed standard for consumer protections. Rather, our request is reflective of a belief that such an expansive rulemaking should be done in a clear, inclusive, open, and transparent process that considers all stakeholder input.

We appreciate your consideration of our comments. If you have any questions or wish to discuss this letter, please do not hesitate to contact me at: btate@ipa.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Tate', is written over a faint, light-colored signature line.

Brian Tate
President and CEO
IPA
btate@ipa.org



6673925.1