



CFPB RELEASES 2019 CARD ACT REPORT

On August 27 the Consumer Financial Protection Bureau issued its biennial report on the state of the credit card market ("Report"). The Credit Card Accountability Responsibility and Disclosure Act of 2009 ("CARD Act") requires a review of the consumer credit market every two years. This is the Bureau's fourth CARD Act Report.

Director Kathleen Kraninger's introduction to the Report states that it is becoming increasingly difficult to causally correlate the CARD Act with specific effects in the marketplace, and the Bureau anticipates future reports will focus more on overall conditions in the credit card market.

The primary findings of the Report include:

- Outstanding credit card balances have continued to grow and purchase volume has grown faster than outstanding balances.
- Delinquency and charge-off rates have increased over the last two years.
- The total cost of credit on revolving accounts has increased, largely as the result of the rising prime rate.
- The total credit line across all consumer credit cards reached 4.3 trillion in 2018, largely due to growth in unused line on accounts held by consumers with superprime scores.
- Card issuers have lowered the range of their daily limits on debt collection phone calls for delinquent credit card accounts.
- Cardholders increasingly use and service their cards through digital portals, including those accessed via mobile devices.

The report includes interesting data on in-house, first party and third party debt collection practices (pp. 141-145) in light of the CFPB's pending debt collection rule. The full report can be accessed at: https://files.consumerfinance.gov/f/documents/201908_cfpb_card-act-report.pdf. □

✧ *Mike Tomkies and Emily Cellier*

Darrell L. Dreher
ddreher@dtlaw.com

Elizabeth L. Anstaett
eanstaett@dtlaw.com

Emily C. Cellier
ecellier@dtlaw.com

Susan L. Ostrander
sostrander@dtlaw.com

2750 HUNTINGTON CENTER
41 S. HIGH STREET
COLUMBUS, OHIO 43215
TELEPHONE: (614) 628-8000 FACSIMILE: (614) 628-1600
WWW.DTLAW.COM

To see previously sent ALERTS, visit our website at www.dtlaw.com

To decline future ALERTS, please contact us at ALERTS@DLTAW.COM. This ALERT has been prepared for informational purposes only. It does not constitute legal advice and does not create an attorney-client relationship.

Michael C. Tomkies
mtomkies@dtlaw.com

Susan M. Seaman
sseaman@dtlaw.com

Lindsay P. Valentine
lvalentine@dtlaw.com

Judith M. Scheiderer
jscheiderer@dtlaw.com

Robin R. De Leo
robin@deher-la.com