

**Commerce Bancshares, Inc.**

Audit and Compliance Department, TB12-1  
1000 Walnut St., P.O. Box 419248  
Kansas City, MO 64141-6248

April 14, 2011

**Delivered Via Email: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov).**

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N. W.,  
Washington, DC 20551

RE: Regulation V; Docket No. R-1407

Dear Ms. Johnson:

Commerce Bancshares, Inc. ("CBI") is a regional bank holding company with one bank subsidiary, Commerce Bank, N.A. ("Commerce"), and total assets of \$18.5 billion at December 31, 2010. Commerce is a full-service bank, with approximately 370 banking locations in Missouri, Illinois, Kansas, Oklahoma, and Colorado and credit card operations in Nebraska. A full line of banking services, including investment management and securities brokerage, is offered. CBI also has operating subsidiaries involved in mortgage banking, credit related insurance, and private equity activities.

We appreciate the opportunity to comment on the proposed changes to Fair Credit Reporting Act (FCRA) added by section 1100F of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).

**Risk Based Pricing Notice with Credit Score Information**

System changes will be necessary for the credit score, source of score, date score was created, range of scores, and the key factors that adversely affected the score to field to the appropriate risk based pricing notices. This process will require coordination between multiple credit reporting agencies and multiple processing systems. In addition, proposed changes to Regulation B, require the same credit score information be disclosed in adverse action notices. As a result, the system changes will require additional enhancements to ensure that the appropriate information is fielded to the correct notice based upon the final decision on the transaction. Therefore, we believe that the mandatory timeframe to comply of July 21, 2011 is not appropriate to allow for publication of final rules by the Board, system enhancements, testing, changes to policies and procedures as well as training. We strongly urge the Board to extend the mandatory compliance date to allow sufficient time to comply with the rule.

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Regulation V, §222.74(b) Adverse Action

The exceptions for providing risk based pricing notices in situations where adverse action is taken does not include the credit score exception notices. There are times when the decision to deny is immediate; requiring both an adverse action notice and a credit score exception notice is confusing to the consumer and does not provide any additional information and/or benefit to the consumer. Therefore, we request as a part of the final rules under this proposal §222.74(b) *Adverse Action* be expanded to include 222.74(d)(e) and (f) when the adverse action notice provided contains the information that satisfies the notice requirements in section 615(a) of the FCRA.

Sincerely,  
Commerce Bancshares, Inc

Sally J. Feistner, CRCM  
Compliance Officer