

September 21, 2021

The Honorable Stephen Lynch  
Chairman, Task Force on  
Financial Technology  
Committee on Financial Services  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Warren Davidson  
Ranking Member, Task Force on  
Financial Technology  
Committee on Financial Services  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairman Lynch and Ranking Member Davidson:

On behalf of the Electronic Transactions Association (ETA), I appreciate the opportunity to submit this statement for the record before the Task Force on Financial Technology's hearing, "Preserving the Right of Consumers to Access Personal Financial Data."

ETA is the world's leading advocacy and trade association for the payments industry. Our members span the breadth of significant payments and fintech companies, from the largest incumbent players to the emerging disruptors in the U.S and in more than a dozen countries around the world. ETA members make commerce possible by processing more than \$21 trillion in purchases worldwide and deploying payments innovation to merchants and consumers.

ETA and its members are dedicated to continuously driving innovation in the payments space. We value the importance of a financial ecosystem whose participants ensure that consumers and businesses are provided with financial products and services that are convenient, secure, and reliable. In this regard, ETA has been supportive of the CFPB developing regulations to implement Section 1033 of the Dodd-Frank Act and congressional efforts exploring the merits of open banking.

Open banking is consumer-centric. It improves efficiency and customer services in the financial services industry by helping parties share data more effectively and increasing not only consumer control over their own information and data, but also choice. ETA shares the prevailing view that consumers already benefit from financial innovations that rely on direct access to their personal and financial data.

In fact, over the past several years, ETA members have developed innovative open banking-enabled products and services that help consumers manage their financial lives, expand financial offerings and access to financial services, lower costs, improve financial management, provide more affordable options, and increase transaction security.

These benefits extend across a diverse and growing universe of financial products and services, including personal financial management software, online lending platforms, mobile wallets, and fraud and identity theft systems. These products and services include the following:

- Personal financial management tools that allow consumers to use a single account to manage all of their financial accounts



- Savings apps that facilitate automatic savings by consumers
- Budget tools that help consumers set and follow budgets
- Lending services that provide consumers with access to simple loan application and underwriting processes
- Bill payment services that allow consumers to manage all their bills through a consolidated service
- Investment management services that facilitate investment or education

Access to financial data and information is an important issue that involves consumers, traditional financial institutions, fintechs, and other financial service providers, including data aggregators and third-party application providers.

ETA and its members recognize the increased convergence between these groups and the need to preserve consumer access, choice, and control. To preserve market dynamism, ETA strongly encourages policymakers to be sensitive to the risk of applying a prescriptive regulatory framework. ETA considers that industry is best positioned to lead the open banking evolution to market in addressing these diverse interests. In particular, ETA and its members support an industry-led and principles-based framework for open data access that promotes innovation and competition among all industry participants in the financial data marketplace, that permits consent-based sharing and use of financial data consistent with the purposes for which it was collected, and that is protective of consumer interests.

We appreciate the Task Force's leadership on this topic as well as the opportunity to submit this letter for the record. If you have any questions, contact me or ETA's Senior Vice President of Government Affairs, Scott Talbott at [stalbott@electran.org](mailto:stalbott@electran.org).

Sincerely,



Jeff Patchen  
Senior Manager of Government Affairs  
Electronic Transactions Association

