

I agree with the concurring statement of Commissioner Ramirez concerning the Mortgages Acts and Practices – Advertising Rule to the extent it reiterates the assertions of the Statement of Basis and Purpose that the “net impression” of an advertisement is a touchstone of FTC deception analysis regardless of the language or combination of languages. It is also axiomatic that government and industry need to be vigilant that all consumers, regardless of what language they speak, are not victims of unfair and deceptive practices.

However, insofar as the concurring statement suggests that the Consumer Financial Protection Bureau should require that mortgage disclosure documents be provided to non-English speaking consumers in their native language, I disagree. There is no basis for making any recommendation to “go beyond” the MAP Rule or Section 5 as respects requirements that lenders furnish “non-English speakers” with disclosures that are not in t int int in