

Attachment 2 to Concise Explanatory Statement
Pursuant to RCW 34.05.325(6)

Summary of written comments received by DFI during the rulemaking process, and DFI's responses to the comments. (RCW 34.05.325(6)(a) (iii))

These are comment summaries prepared by DFI. For the entire comment see our website.

Date of Comment	Commenter	General Topic of Comment/Applicable WAC	DFI Response
3/13/2016	MoneyTree	WAC 208-630-110 – advertising section.	No changes were made based on this comment. All definitions apply to all licensees.
		WAC 208-630-501(5) – paying off loans early with no fee. Please reword this language to not make it appear that partial payments can be made.	Changes were made to the proposed language based on this comment.
		WAC 208-630-520(4)(b) – installment plan payments. Please revise this section so that it doesn't conflict with (a). Also, some months of the year have 31 days. Finally, please revise to accommodate customers who are paid every 7 days.	Changes were made to the proposed language based on this comment.
		WAC 208-630-520(4)(d) – installment plan payments. Is use of the word "paid" different from "pay date"? Please clarify.	Changes were made to the proposed language based on this comment.
		WAC 208-630-520(4)(e) – installment plan payments. Please revise this section to clarify deposits of payments are the transfer of compensation, benefits, or income. Please clarify to specify when a	Changes were made to the proposed language based on this comment.

		borrower actually receives income that is paid electronically. Please clarify use of the words "compensation" and "income" and the words "days" and "date"	
		WAC 208-630-545 – use of trade names. Please revise this section to not require a license number and license name for use with a trade name.	No changes were made based on this comment.
		WAC 208-630-556(11) – Please clarify the rescission requirements by including the electronic transfer of funds.	Changes were made to the proposed language based on this comment.
		WAC 208-630-556(12)(d) – Please clarify that the lender must receive formal notice of a bankruptcy before closing a loan.	Changes were made to the proposed language based on this comment.
		WAC 208-630-605 – Please clarify that this language applies to a licensee’s books and records under the Act.	Changes were made to the proposed language based on this comment.
		WAC 208-630-606 - Please clarify that this language applies to a licensee’s books and records retention period under the Act.	Changes were made to the proposed language based on this comment.
		WAC 208-630-715 – Requirements under federal law. Please clarify that this is a summary of the law and not a new requirement.	No changes were made based on this comment.
		WAC 208-630-716 - Requirements under federal law. Please clarify that this is a summary of the law and not a new	No changes were made based on this comment.

		requirement.	
		WAC 208-630-835 – data breach. Please clarify that this is a breach of a security system. Please clarify that “data breach” has the same meaning as that under RCW 19.255.010(4).	No changes were made based on this comment.
4/14/2016	QC Holdings, Inc.	WAC 208-630-520(4)(b) – installment plan payments. Some months of the year have 31 days. Please revise the language to accommodate that.	Changes were made to the proposed language based on this comment.
4/18/2016	MoneyTree	WAC 208-630-520(4)(b) – installment plan payments. Please insert the word “and” between the time period and the distribution of payments.	Changes were made to the proposed language based on this comment.
		WAC 208-630-520(4)(d) – installment plan payments. It will be difficult to accommodate all of the different and irregular pay schedules. We don’t see any benefit to the borrower with this language.	Upon further consideration the department has removed this requirement.
		WAC 208-630-520(4)(e) – installment plan payments. Please clarify the use of different terms.	Upon further consideration the department has removed this requirement.
		WAC 208-630-715 – GLBA. Please clarify whether this rule is a requirement in addition to compliance with GLBA.	Changes were made to the proposed language based on this comment.
		WAC 208-630-716 - GLBA. Please clarify whether this rule is a requirement in addition to compliance with GLBA.	Changes were made to the proposed language based on this comment.