



DCUC
DEFENSE CREDIT UNION COUNCIL

1627 Eye St, NW
Suite 935
Washington, DC 20006

202.734.5007
www.d cuc.org

Jason Stverak
Chief Advocacy Officer

June 26, 2024

The Honorable Cathy McMorris Rodgers
United States House of Representatives
1035 Longworth House Office Building
Washington, DC 20515

The Honorable Frank Pallone
United States House of Representatives
237 Cannon House Office Building
Washington, DC 20515

Dear Chair McMorris Rodgers and Ranking Member Pallone:

On behalf of America's 182 Defense Credit Unions and over 37 million members, I am writing to express the Defense Credit Union Council's concerns with the American Privacy Rights Act of 2024. The Defense Credit Union Council (DCUC) advocates for all defense credit unions stateside and abroad. Everything we do is in support of our military and veteran communities, no matter which credit union they join. Earlier this year, we voiced our concerns to Congress regarding this legislation and our issues remain (see <https://bit.ly/APRA2024>).

We support efforts to strengthen data privacy and prevent the buying and selling of personal information. However, we are concerned about how this legislation overlaps and contradicts other federal privacy laws such as the Gramm-Leach-Bliley Act (GLBA) and the Health Insurance Portability and Accountability Act (HIPAA). Other than data security, it is unclear whether credit unions already in compliance with these laws will be exposed to new lawsuits despite GLBA compliance. Additionally, we are concerned about the expansion scope and legal uncertainties that would arise from the adoption of the individual right of action proposed by the legislation.

Finally, we are interested in whether merchants will be held to the same data security requirements as financial institutions. Merchants have a larger role in safeguarding data as consumers have fewer opportunities to opt out when purchasing goods and services. Overall, the American Privacy Rights Act has the potential to create market uncertainty, particularly in educating consumers about their rights to opt out of data collection.

Thank you for the opportunity to bring these matters to your attention. Should you have any questions or desire additional information, please do not hesitate to contact me at 202.557.8528 or by email at jstverak@dcuc.org.

Sincerely,

Jason Stverak
Chief Advocacy Officer, DCUC

Serving Those Who Serve Our Country