# Complaints.gov: Building a Modern Infrastructure for Accountability







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The Vanderbilt Policy Accelerator focuses on cuttingedge topics in political economy and regulation to swiftly bring research, education, and policy proposals from infancy to maturity.

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### Introduction

Like many people trying to start families, MK and her husband thought they did everything right. When they realized having a baby on their own would be challenging, they made a plan with their doctor and specifically shopped for health insurance that would cover IVF. It wasn't until they were locked into that new insurance plan that they were told yes, it would "cover IVF," but it wouldn't cover the tens of thousands of dollars of drugs that were needed for IVF to work. They were devastated, and the insurance company was stonewalling them, and sending them into never-ending loops. They needed help from someone who could get answers.

At the time, they had no idea that the Maryland Insurance Administrator not only took consumer complaints, would force the insurance company to cough up the coverage they promised, and would fix the issue for other Marylanders, but that they'd already paid for the service for years with their state taxes.<sup>1</sup>

The best engineers optimize systems for resilience. If something important fails, the system itself is designed to survive that failure. Our system of consumer protections and corporate accountability is not perfect, but in many cases help does exist. The problem is that too few people know how to find that help because the user interfaces for accessing it are piecemeal, hidden, complicated — in a word, awful. We need to engineer a better approach to using existing protections when people are hurt by powerful companies.

Every day, people try to fix errors in their credit report, challenge an insurance denial based on a faulty algorithm, or restore access to a hijacked small business account, only to find themselves stuck in a maze of dead-end websites, incessant hold music, and frustrating back-and-forths with chatbots. People are caught in opaque, Alpowered systems with no clear way to report harm, get help, or even be heard. They are bombarded with requests to rate businesses — ideally with five stars. But when things go very wrong, and the business won't fix the issue, it's not clear how to go beyond a star system to get real help and straight answers.

People are often shocked when they find out that there are top-tier attorneys, investigators, and customer service representatives that already work for the public,

<sup>&</sup>lt;sup>1</sup> File A Complaint, Md. Ins. Admin., <a href="https://insurance.maryland.gov/Consumer/pages/fileacomplaint.aspx">https://insurance.maryland.gov/Consumer/pages/fileacomplaint.aspx</a> (last visited Dec. 15, 2025).



and can help them get a straight answer, fast. They have no idea that the Consumer Financial Protection Bureau (CFPB), their state insurance commissioner, or their state Attorney General exist, let alone that they tackle consumer complaints, and often do a really wonderful job.<sup>2</sup> They may be underfunded, but we do have regulators. What we don't have is infrastructure.

For example, the CFPB's system alone has helped more than 12,160,350 people get answers to date,<sup>3</sup> spurred companies to return at least \$93,519,454 to complainants in 2024 alone,<sup>4</sup> shared complaint data with at least 1,373 state, federal and local consumer protection law enforcement agencies and published real-time insight into what's going wrong in consumer finance.<sup>5</sup>

To address these problems with vigor and across markets, what we need is a national complaint clearinghouse that connects people to the right help, gives even small regulators modern tools, and makes redacted complaint data public and actionable. Call it Complaints.gov. This platform would make getting help easy and treat complaints as the critical signals they are: Indicators of failing markets, broken platforms, and regulatory blind spots.

# A Fragmented System Fails Everyone

Right now, if a company cheats you or stonewalls you, figuring out where to go for help is like solving a jigsaw puzzle where instead of a picture on the front, the design is described in disparate legislative text over hundreds of years. If you were tricked by a shady credit offer, go to the CFPB. Your insurance company screwed you over? Maybe turn to your state insurance commissioner for help — if you have the right kind of

<sup>&</sup>lt;sup>5</sup> The total number of agencies is not public, but CFPB is the top contributor to the FTC's consumer sentinel, which has 1,373 member agencies: Consumer Sentinel Network, *Sentinel Members*, FED. TRADE COMM'N, <a href="https://register.consumersentinel.gov/Agency">https://register.consumersentinel.gov/Agency</a> (last visited Dec. 10, 2025).



<sup>&</sup>lt;sup>2</sup> Kelly O'Brien, *NH Attorney General Sues Health Care Companies After Patients Struggle to Get Records*, WMUR (Dec. 10, 2025), <a href="https://www.wmur.com/article/nh-attorney-general-lawsuit-pain-clinic-121025/69689938">https://www.wmur.com/article/nh-attorney-general-lawsuit-pain-clinic-121025/69689938</a>.

<sup>&</sup>lt;sup>3</sup> Consumer Complaint Database, Consumer Fin. Prot. Bur., <a href="https://www.consumerfinance.gov/data-research/consumer-">https://www.consumerfinance.gov/data-research/consumer-</a>

complaints/search/?chartType=line&dateInterval=Month&dateRange=All&date\_received\_max=2025-12-10&date\_received\_min=2011-12-01&lens=Product&searchField=all&subLens=sub\_product&tab=Trends (last visited Dec. 10, 2025).

<sup>&</sup>lt;sup>4</sup> Consumer Fin. prot. Bur., Consumer Response Annual Report (2024), https://files.consumerfinance.gov/f/documents/cfpb\_cr-annual-report\_2025-05.pdf.

employer. Ripped off by a gig work platform? The right place for assistance could be your state attorney general, or maybe the U.S. Department of Labor.

According to my analysis, there are at least 176 different government agencies, at the federal and state level, take consumer complaints in the United States.<sup>6</sup> Every agency has its own form, its own definitions, and its own siloed system. Even when you do manage to file a complaint, it can disappear into a black hole without updates, visibility, or any idea if it helped anyone else. This makes it harder for people to file complaints that get results, and nearly impossible for the government to spot patterns of harm across jurisdictions.

These fractured approaches weaken our ability to govern. Small agencies, often closest to the public, are left trying to keep up with yesterday's tools. For example, in my conversations with enforcers, I found that even in 2025, a number of U.S. consumer protection agencies are still using spreadsheets on their desktops rather than modern tools. And only one of the 176 systems has a complaint-level public database or any way for companies to reply systematically to complainants, the CFPB. Even well-funded complaint systems like the Federal Trade Commission's do not make it clear that the agency and companies will never respond to a complaint submitted there.<sup>7</sup>

The scattered approach of different, unrelated systems has also led to most data staying closed. One-off Freedom of Information Act (FOIA) or Sunshine Act requests on a particular topic might unearth a small portion of this critical information, but affirmative open data requirements can be a large operational and privacy lift for smaller jurisdictions. As a result, there are no platforms that publish data on which companies carefully follow the law and which companies are responsive to the complaints of their customers — both of which would create incentives for companies to develop better systems. This absence of usable information harms consumers and companies: Consumers have a hard time comparison shopping, and companies have difficulty benchmarking their performance against their competitors. The piecemeal approach thus contributes to a frustrating consumer experience and weakens the feedback loops that should improve corporate performance.

<sup>&</sup>lt;sup>7</sup> ReportFraud.ftc.gov, FED. TRADE COMM'N., https://reportfraud.ftc.gov/ (last visted Dec. 10, 2025).



<sup>&</sup>lt;sup>6</sup> This includes state insurance commissioners, state attorneys general, city tenant advocates, utilities commissions, federal regulators and more.

# Complaint Systems Are An Early Warning System For The Economy

For many years, I worked on consumer complaint issues. I helped build the complaint platform at the Ohio Attorney General's Office as well as at the CFPB, and worked closely with the data inside the Federal Trade Commission's Consumer Sentinel Database.

What I saw again and again was this: nothing beats hearing directly from people experiencing problems in their own words. A military family trying to refinance before deployment. A woman whose mortgage servicer kept "losing" her paperwork. A small business owner watching a fraudster use her online shop's name to rip off customers.

For example, by 2023, the ten largest banks in the U.S. were using chatbots to outsource customer service duties, and while there was no consumer complaint form in the country that was specifically soliciting "Al" complaints, people were certainly having problems. Ultimately, the CFPB's complaint system was flexible enough and the narratives were public, so by searching the term "human," you could find sprawling horror stories of people being sent in infinite circles instead of getting help. One person described:

"Hours spent trapped in automated systems...The automated system repeatedly misunderstood my voice responses ... Hung up unexpectedly ... Routed me incorrectly multiple times ... Refused to connect me to a live representative despite repeated requests. Despite 19 attempts over these two consecutive days, I could not reach anyone capable of resolving my issue."

Americans are struggling to get help, especially with the incorporation of AI and automated systems into everything from our relationship with our banks to contacting

<sup>&</sup>lt;sup>9</sup> Consumer Complaint No. 15494109, *Consumer Complaint Database*, Consumer Fin. Prot. Bureau (Aug. 25, 2025), <a href="https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/15494109">https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/15494109</a>.



<sup>&</sup>lt;sup>8</sup> Consumer Fin. Prot. Bur., Chatbots in Consumer Finance (2023), https://files.consumerfinance.gov/f/documents/cfpb\_chatbot-issue-spotlight\_2023-06.pdf.

the Social Security Administration.<sup>10</sup> Timely, public feedback like this is essential to addressing these problems.

These complaints aren't just anecdotes; they're early warning signs. When complaints can work together, and are accessible and structured, they can power smarter regulation, faster enforcement, and better outcomes for businesses and the public alike.

# When We Ignore Complaints, Everyone Loses

Without a system like Complaints.gov, the consequences are predictable.

**People get stuck.** It's tough trying to navigate Byzantine systems during some of the hardest moments of their lives. There's no clear escalation path, and it feels like there's no way to get a straight answer. Increasingly automated customer service is making this worse.

Regulators are flying blind. Without a complete picture, agencies can't keep up with emerging harms and cannot easily work together on shared problems.

Good companies pay the price. Companies who play by the rules miss out on potential customers who can't uncover which firms are the most responsive and honest when comparing options.

Trust erodes. Despite more than a hundred years of laws on the books designed to protect people from corporate abuse, people feel the government has sided with the companies. They assume no one is watching, no one cares, and no one will help. That cynicism is earned, and it's dangerous. It also contradicts the instructions of legislators at the federal and state level who have worked to codify critical protections in law.

<sup>&</sup>lt;sup>10</sup> Meryl Kornfield and Hannah Natanson, *Social Security stops reporting call wait times and other metrics*, WASH. POST (June 20, 2025), <a href="https://www.washingtonpost.com/politics/2025/06/20/social-security-wait-times-cuts/">https://www.washingtonpost.com/politics/2025/06/20/social-security-wait-times-cuts/</a>.



# A Different Approach: Complaints.gov

What we need is a way to maximize the benefits of the systems we already have: the hundreds, even thousands, of hard-working civil servants who want to help consumers. What we need is Complaints.gov. Complaints.gov wouldn't be a new agency. Rather, it's a way for consumers to complain about the problems they're facing in the marketplace, and to be routed — easily — to the right enforcers and advocates to help them. At the same time, its database of complaints would serve as a resource for enforcers to identify trending scams, fraud, and other problems. In other words, it would be a connective layer for the accountability infrastructure we already have. Here's how it would work:

- A Simple Complaint Form: A simple, plain-language form that routes the complaint to the right place for help, built on top of flexible APIs. This is not a "one-stop shop," or "single front door" approach, this is making it so there is no wrong door.
- A Public Complaint Database: Much like the CFPB's complaint database, it would have personally identifiable or sensitive information redacted for privacy, but would include the narrative of what happened in the person's own words (with their consent), and be searchable, for example, by company, issue, and outcome. This transparency fuels better behavior.
- Regulator Tools: Lightweight, secure case management and data tools to help smaller agencies collaborate, get answers, and spot trends.
- Business Tools: A structured way for companies to respond to complaints on the platform and learn from them, so they don't have to wait for enforcement to address problems.

This is a proposal for infrastructure that plugs into what already works, and meets people where they are, whether they're on a state website, a social media platform, or a company's own receipt.

Complaints.gov could be run by the General Service Administration's Technology Transformation Service, which runs government-wide tech services such as Login.gov and Data.gov, funded by the bipartisan Technology Modernization Fund, and then reimbursed by the money saved avoiding the maintenance of old systems and manual



work.<sup>11</sup> Or, Congress could authorize and fund the creation and maintenance of the system.

# **Building From What Works**

Complaints.gov is a bold idea but it's also readily achievable. In fact, we have a model for how to do it in the CFPB's complaint system. The technology and process itself could be scaled. The CFPB system works, already processes the largest volume of complaints in the United States, and is integrated with enforcers across the country.<sup>12</sup>

Launched at the direction of Congress in 2011, the CFPB's complaint system has helped more than 12 million people get answers, including more than 5.2 million so far in 2025 alone.<sup>13</sup> Before this system existed, if someone discovered during the mortgage application process that a credit reporting agency believed them to be deceased, they were typically stuck and may have missed out on the home or mortgage rate they were after. After all, there's no "life certificate" to persuade the company, and in fact, the credit reporting agency might think your attempts at contacting them were fraudulent, because, hey, you're dead.<sup>14</sup> People reported struggling to even get to a human at these companies to make their case.

The CFPB system allows you to file a quick complaint, that complaint is automatically routed to the company in question who has about two weeks to confirm you're a consumer of theirs, work with you to get to the bottom of what happened, address it,

Consumer Complaint Database 1/1/2024 – 12/31/2024, Consumer Fin. Prot. Bur.,

https://www.consumerfinance.gov/data-research/consumer-

complaints/search/?chartType=line&dateInterval=Month&date received max=2024-12-

<u>31&date received min=2024-01-01&lens=Product&searchField=all&subLens=sub product&tab=Trends</u> (last visited Dec. 15, 2025).

<sup>&</sup>lt;sup>14</sup> Consumer Complaint No. 15998568, *Consumer Complaint Database*, Consumer Fin. Prot. Bureau (Sept. 17, 2025), <a href="https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/15998568">https://www.consumerfinance.gov/data-research/consumer-complaints/search/detail/15998568</a>.



<sup>&</sup>lt;sup>11</sup> Technology Modernization Fund, GEN. SERV. ADMIN., <a href="https://tmf.cio.gov/">https://tmf.cio.gov/</a> (last visited Dec. 15, 2025).

<sup>&</sup>lt;sup>12</sup> In 2024, CFPB processed 2,737,663 million complaints. The second highest volume of complaints was processed by the Federal Communications Commission with 303,265 complaints in 2024. The FTC received 6.47 million "reports" in 2024, but does not consider them "complaints" and does not "process" or respond to them. *CGB - Informal Complaints Filed by Month Current YTD*, FED. COMMC'NS COMM'N, <a href="https://opendata.fcc.gov/Consumer/CGB-Informal-Complaints-Filed-by-Month-Current-YTD/6s3p-rnpf">https://opendata.fcc.gov/Consumer/CGB-Informal-Complaints-Filed-by-Month-Current-YTD/6s3p-rnpf</a> (last visited Dec. 15, 2025); FED. TRADE COMM'N…, CONSUMER SENTINEL NETWORK 2024 DATA BOOK (2025), <a href="https://www.ftc.gov/system/files/ftc\_gov/pdf/csn-annual-data-book-2024.pdf">https://www.ftc.gov/system/files/ftc\_gov/pdf/csn-annual-data-book-2024.pdf</a>;

<sup>&</sup>lt;sup>13</sup> Consumer Complaint Database, *supra* note 1.

and respond to the agency about the outcome. Then details about your complaint are made public, and with your permission, the story of what happened in your own words.<sup>15</sup>

From the company side, they get a clear, structured way to respond to the regulator, including a tracking number and clear expectations on response. In the public data, the companies can see the details about how their competitors are addressing similar complaints, and they can ensure that they outperform their competitors by quickly addressing the questions from their own customers.

While as of the date of publication the system is still working, Acting Director of the CFPB Russell Vought has vowed to "close down" the CFPB within months despite court orders otherwise. While the CFPB's complaints system is at risk under the current administration, there remain lessons to learn from more than a decade of delivering concrete results and a transparent process — built by an agency a little younger than Pinterest.

# How Complaints.gov Would Actually Work

Complaints.gov is not a single, giant new agency or system that has to be built all at once. It's a modern platform that can grow in phases, starting simple and becoming more powerful over time and strengthening the work regulators already do. The goal is that no matter where someone goes for help — their state Attorney General's website, a city consumer protection office, or Complaints.gov itself — they can get routed to the right place, track what happens next, and know someone is actually working on their issue.

#### Phase 1

#### The Routing Layer

The first version could launch quickly as a simple website that points people to the right agency for help via their existing consumer complaint system. If someone says, "My insurance company denied coverage and I live in Alabama,"

<sup>&</sup>lt;sup>16</sup> Nandita Bose, Doina Chiacu, & Douglas Gillison, *White House budget director Vought plans to shut down CFPB within months, says it's no longer protecting consumers*, REUTERS (Oct. 15, 2025), <a href="https://www.reuters.com/business/world-at-work/white-house-budget-director-vought-says-over-10000-federal-workers-could-be-laid-2025-10-15/">https://www.reuters.com/business/world-at-work/white-house-budget-director-vought-says-over-10000-federal-workers-could-be-laid-2025-10-15/</a>.



<sup>&</sup>lt;sup>15</sup> Learn how the complaint process works, Consumer Fin. Prot. Bur., https://www.consumerfinance.gov/complaint/process/ (last visited Dec. 10, 2025).

the system would direct them to the Alabama Insurance Commissioner's office. Even this thin "routing" layer would fix a huge usability problem: people would no longer have to guess where to go.

#### Phase 2

#### The API Layer: Connecting the Existing Systems

Once the routing layer works, the next step is to develop the platform with simple, secure connections called application programming interfaces (APIs) so that regulators can plug in without rebuilding their own websites. For example, a state Attorney General could keep their own complaint form and branding. It could look and feel like their own system, but behind the scenes, the data would securely flow through Complaints.gov.

In other words, people would see that their state office is helping them, while also benefiting from the speed and transparency of a shared national system. You can think of it like a common civic backbone: each agency keeps its own identity, but they're all connected through one secure, modern infrastructure. When someone gets an update or reply, it still comes from "your state Attorney General's Office," (or whichever office is appropriate) but it's powered by the Complaints.gov platform.

#### Phase 3

#### Complaints.gov: The Reference Implementation

Simultaneous to Phase 2, using the APIs, Complaints.gov would be built as a reference implementation of the same infrastructure, and host full end-to-end complaint handling. A person can now file directly on Complaints.gov, track their case, and see updates. The system automatically routes the issue to the right company and regulator.

Regulators can choose how deeply they want to connect with Complaints.gov:

- Referral only: Send people to Complaints.gov for routing complaints they don't handle. Receive complainant traffic from Complaints.gov for issues they do handle.
- **Light integration:** Keep their own site and branding, but connect through the API for certain case types. Use the backend for trend spotting and analysis.
- Full integration: Replace legacy backend systems with Complaints.gov, embed Complaints.gov forms, and use the shared tools and data systems directly.



Each step builds toward a national accountability infrastructure that feels local and effective, but runs on modern, connected technology. People would still recognize and trust the regulator they're dealing with; they'd just know that regulator now has the full weight of a nationwide system behind them.

## Why Now

Al systems are making life-altering decisions about credit, employment, insurance, housing and more, often without transparency or recourse. Automated and broken moderation tools boot small businesses offline without warning.<sup>17</sup> Platform decisions affect the lives and livelihoods of millions, yet when something goes wrong, company customer service is increasingly *also* automated, leaving people feeling like there's no clear way to reach a person who can resolve their problem or file a complaint, let alone track what happens next.

When a young mother gets denied with no explanation or recourse from an apartment that's well-suited to her, she might think that it "should be illegal" to do that. Turns out, it is already illegal. Legislators at the state and federal level have passed laws that require explanations and recourse, for example, the adverse action notices mandated by the Fair Credit Reporting Act. But if the apartment uses an Al system for tenant background checks that isn't able to meet explainability standards, and "explains" that "the computer" denied her, she's facing the kind of dead end that is becoming more common with Al systems being baked into essential services, and the kind of dead end that lawmakers foresaw and outlawed. In order for her to take the next step to exercise her rights, she'd have to know that there were protections in place, who to turn to, and what will happen when she asks for help.

At the same time, trust in public institutions is historically low.<sup>20</sup> People don't just want services to work; they need to know that someone is watching, someone is listening,

https://www.pewresearch.org/politics/2025/12/04/public-trust-in-government-1958-2025/.



<sup>&</sup>lt;sup>17</sup> Kevin Ozebek, *After ABC7 report, more social media users say Meta wrongly suspended their accounts*, ABC7 L.A. (July 25, 2025), <a href="https://abc7.com/post/facebook-instagram-users-us-say-meta-wrongly-suspended-accounts/17281042/">https://abc7.com/post/facebook-instagram-users-us-say-meta-wrongly-suspended-accounts/17281042/</a>.

<sup>&</sup>lt;sup>18</sup> Under the Fair Credit Reporting Act, when a person is denied an apartment based on information in a consumer report, they must be provided with notice explaining the denial. 15 U.S.C. § 1681m(a).

<sup>&</sup>lt;sup>19</sup> Fair Credit Reporting Act § 610(c), 15 U.S.C. § 1681h(c) ("Trained personnel. Any consumer reporting agency shall provide trained personnel to explain to the consumer any information furnished to him..."). <sup>20</sup> Public Trust in Government: 1958-2025, PEW RES. CTR. (Dec. 4, 2025),

and someone will act. While some agencies are doing heroic work with limited tools, our systems aren't scaling. Government needs modern infrastructure to work.

For example, even the Federal Trade Commission — once the United States' premier consumer protection agency, born from blowback over the overpowering oil and railroad trusts squeezing Americans — accepts complaints but doesn't respond to them, let alone ask the companies at issue to respond to them. The complaints that people submit are used as essentially "law enforcement tips" — information that enforcers might use someday to look into a company or practice. This "black hole" approach leaves complainants wondering if anyone is going to help them, discovering the answer is "no" when no one ever responds, which ultimately decreases the likelihood they will complain again. <sup>21</sup> In order to unearth consumer problems before they're crises, this must change.

#### The Market Case

There is also a pro-markets and pro-competition case for Complaints.gov. In the short term, the biggest corporations might get some benefit from the current disarray. They can hire enough lobbyists and lawyers to evade meaningful oversight when things go wrong for regular people, and they benefit from take-it-or-leave it terms of service and arbitration clauses. But what company wouldn't want access to what isn't working in their products to help them better tailor them to the needs of their customers? Connecting people with timely, public, consumer complaints can also expose leading indicators of systemic failure that pose risks to consumers and corporate America alike. For example, when I served in the Ohio AG's office, we saw a stream of complaints from Ohioans about companies that "lost" mortgage documents and had broken customer service processes that preceded a catastrophic wave in the 2008 financial crisis. Detecting and addressing potential systemic failures is also the job of the government.

<sup>&</sup>lt;sup>21</sup> Studies show that people don't complain if they feel that "complaining will not do them any good." Jean-Charles Chebat, Moshe Davidow & Isabelle Codjovi, Silent Voices: Why Some Dissatisfied Consumers Fail to Complain, 7 J. Serv. Rsch. 328, 328 (2005) (citing Steve Downton, Measurements to Achieve Customer Focus (2002), http://www.downtonconsulting.com/articles/Customers/measurements).



There are other efficiencies made available by this system:

- When the bar is higher and more visible, honest businesses are rewarded for being honest. Public complaints help level the field when people are shopping for services or trying to uncover the best option for their needs.
- Many communities benefit when there's a clear place to go, whether you're a gig worker, a caregiver, a young entrepreneur, a senior making ends meet, or someone trying to rebuild after fraud.
- Regulators benefit from information that helps them respond before a small harm becomes a nationwide emergency.

To people who may be skeptical of a new service from the government: This isn't just another government website; it's infrastructure. The same way 311 isn't just a phone number, it's a system that connects people to help. Additionally, this won't duplicate what's already out there. It's tech-fueled connective tissue that makes existing agencies more effective at hearing from the public, getting answers for the public and acting on what they hear. And Complaints.gov could lead to significant future efficiencies, lowering overall costs.

Finally, existing complaint databases indicate that the size of the business roughly correlates to the number of complaints — meaning small businesses won't get an outsized new burden.<sup>22</sup> Today, some regulators are notorious for focusing outsized scrutiny on firms small enough that they're not able to fight back.<sup>23</sup> A small family-

<sup>&</sup>lt;sup>23</sup> Rohit Chopra, *Reining in Repeat Offenders: 2022 Distinguished Lecture on Regulation,* Consumer Finance Protection Bureau (Mar. 28, 2022), <a href="https://files.consumerfinance.gov/f/documents/cfpb reining-in-repeat-offenders cited-lecture 2022-03.pdf">https://files.consumerfinance.gov/f/documents/cfpb reining-in-repeat-offenders cited-lecture 2022-03.pdf</a> ("[G]overnment lawyers are never adequately staffed to go up against corporate lawyers trained to spin wheels and run out clocks. Some litigate for years with the hope of the regulator giving up or a new, more forgiving administration coming in. The smaller companies become the low-hanging fruit with cases that are easier to quantify, qualify, and take to court. Whatever the reasons, regulators are willing to lay down the hammer on little guys but settle for press headlines with the big guys.")



<sup>&</sup>lt;sup>22</sup> For example, the CFPB's complaint database reports complaints in absolute numbers rather than normalized by firm size or activity. Because complaint volume scales mechanically with customer base, transaction volume, and market share, larger firms predictably receive more complaints in raw terms than smaller firms. In academic studies analyzing CFPB complaint data, authors emphasize complaint rates, such as complaints per loan originated or per account serviced, rather than raw complaint totals. See Ian Ayres, Jeff Lingwall & Sonia Steinway, *Skeletons in the Database: An Early Analysis of the CFPB's Consumer Complaints*, 19 FORDHAM J. CORP. & FIN. L. 343, 350–64 (2014). Accordingly, smaller businesses can be expected to face fewer complaints in absolute terms and will not experience a disproportionate compliance burden relative to large firms.

owned laundromat should not suffer more scrutiny than firms that are able to hire former regulators as lobbyists.<sup>24</sup> And even for firms that receive more complaints because of their larger customer base, this system will organize and systematize complaint contact from regulators, rather than back-and-forth emails and calls with individual investigators, constituent and analysts.

#### A Vision for the Future

The public has already invested in the expertise, the systems, and the people. What we're missing is the connective layer that makes the most of those resources and turns siloed complaints into shared knowledge and real help.

When we treat complaints as the urgent, valuable signals from people trying to exercise their rights, we have a chance to fix problems before they're endemic. Exercising those rights can make a meaningful difference in people's lives. It can mean someone is finally able to get access to the medical care that would allow them to have a badly-wanted baby, like MK and her husband did in Maryland. It can mean getting the apartment close enough to childcare and work, like that mom wanted to. It can mean a senior stopping fraud before it cleans out their account. Or it can even just mean getting a straight answer instead of a doom loop.

We can give people a place to go for help. We can give regulators a way to respond. And can we give everyone a reason to believe that help is not only possible, it is already on the way.

Let's build Complaints.gov.

<sup>&</sup>lt;sup>24</sup> Rohit Chopra, *Prepared Remarks of CFPB Director Rohit Chopra at the 2023 American Economic Liberties Project Anti-Monopoly Summit,* Consumer Finance Protection Bureau (May 5, 2023), <a href="https://www.consumerfinance.gov/about-us/newsroom/prepared-remarks-cfpb-director-rohit-chopra-2023-american-economic-liberties-project-anti-monopoly-summit/">https://www.consumerfinance.gov/about-us/newsroom/prepared-remarks-cfpb-director-rohit-chopra-2023-american-economic-liberties-project-anti-monopoly-summit/</a>.

