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Analyzing the CFPB's Stance on Comparison Shopping and Lead Generation Websites

The Consumer Finance Podcast

SPEAKERS

[Chris Willis](#)

In this episode of *The Consumer Finance Podcast*, Chris Willis discusses the Consumer Financial Protection Bureau's (CFPB) recent circular on comparison shopping and lead generation websites. The CFPB asserts that certain practices related to these websites are abusive under the Dodd Frank Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) regulation. The CFPB argues that it is abusive for website operators to influence their display or ranking of consumer financial products and services based on compensation they receive from product providers. Willis critiques the CFPB's stance, arguing that the Bureau is attempting to rewrite commerce rules by labeling practices as abusive, in conflict with long-standing regulatory guidance focused on disclosures on such websites. Despite the CFPB's circular, he suggests that the industry will likely continue to rely on appropriate disclosures to ensure consumers are informed of how products are presented in online contexts.

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