



MICHIGAN BANKERS ASSOCIATION

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DENNIS R. KOONS, President & Chief Executive Officer

March 29, 2004

Office of the Comptroller of the Currency – Docket #03-10
Board of Governors of the Federal Reserve System – Docket #R-1151
Federal Deposit Insurance Corporation – 12 CFR, Ch. III
Office of Thrift Supervision - #2003-02

Via: <http://www.EGRPRA.gov>

Re: Lending-Related Rules; Economic Growth and Regulatory Paperwork Reduction Act of 1996
Review

Dear Regulators:

The Michigan Bankers Association (MBA) represents over 190 commercial banks and thrifts in the state of Michigan. We welcome the opportunity to comment on the proposal to amend the various regulations pertaining to the Economic Growth and Regulatory Paperwork Reduction Act of 1996.

The proposal would amend Regulation E to add a definition of “clear and conspicuous” that would be consistent with the definition contained in Regulation P, Privacy of Customer Financial Information. Currently, Regulation E provides that disclosures must be “clear and readily understandable.” Regulation P currently defines the “clear and conspicuous” standard to mean that the disclosure is “reasonably understandable and designed to call attention to the nature and significance of the information.” The Regulators believe that the recently implemented standard in Regulation P is a more precise explanation of the concepts underlying the duty to provide disclosures that consumers will notice and understand.

Overall, the MBA supports reduction of regulatory burden on insured depository institutions and we also support ensuring that the disclosures are as clear and understandable as possible for consumers. However we are opposed to these proposals. We do not believe they meet the goals established in issuing the proposals. These proposals would not ensure that consumers receive noticeable and understandable information that is required in connection with obtaining consumer financial products and services.

We would like to urge the withdrawal of these proposals. The review and various required changes to current forms would create tremendous costs to our financial institutions. The MBA does not believe the benefit of implementing the proposed changes outweighs the burden of financial and human resources.

The MBA appreciates the opportunity to comment on this very important matter. If you have any questions regarding this letter, please contact the MBA at (517) 485-3600 or tgreisinger@mibankers.com.

Sincerely,

A handwritten signature in cursive script that reads "T. G. Greisinger".

Terry G. Greisinger
Vice President, Government Affairs