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2401 Grand Ave.
Billings, MT 59102
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Western Security Bank Compliance Dept.

December 19, 2005

Docket No. R-1217

Regarding the proposed changes to Regulation Z open-end credit disclosures.

There may indeed be a need for reform on some types of open-end credit programs but Home Equity Lines of Credit are not one of those programs. We feel that financial institutions have been extremely diligent and conservative for the most part on these types of loans. Our institution is willing to extend credit for up to 80% of the appraised value of a property less the first mortgage, especially if we are not going to be in first position on the lien. In addition, our HELOC products include a maturity date.

In today's market Home Equity Line of Credit applicants are not uninformed; they generally have a first mortgage and have built up enough equity to qualify for additional credit. Many qualify for credit cards with lower rates but choose the line of credit product for the possible tax advantage. They receive an early program disclosure; they usually choose their own terms of interest only or fixed payments. They are given a chance to rescind and their monthly statements have comprehensive information.

The proposed additional disclosures and calculations are not adding any new information for our borrower, rather it just adds to the burden for the customer and the financial institution. The information that these changes propose is already provided or readily available at our type of financial institutions where it may not be at the quasi-financial institutions.

Open-end Lines of Credit that are provided by financial institutions such as ours should be exempt from these changes.

Thank you.

Sincerely,

Jeff Copeland
Compliance Officer

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