

**From:** "Bob Schroeder" <bob@ilcomcu.org> on 10/05/2007 02:50:03 PM

**Subject:** Truth in Lending

I feel the FRB proposed change to Regulation Z terminating the use of open-end credit plans for the purchase of automobiles is an unnecessary burden to both the financial institution and the consumer.

The Specific burdens are:

1. Loss of convenience to the consumer. Increased documentation to process an auto loan slows down the delivery of the loan and requires signatures prior to disbursal. Using our current open end documents, once a member is enrolled in our open-end plan we can fund auto loan request with a phone call.
2. Consumers may pay higher finance charges and other costs. The increased burden of documentation will most likely result in the consumer financing their vehicle at the auto dealer and pay a higher APR, and more on other services such as GAP insurance and Mechanical Repair Coverage.
3. Operational costs will increase which will be passed on to the consumer.

Please reconsider your proposal.

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