

From: Texans Credit Union, Jeanine Cadena and Chris Walton  
Subject: Electronic Fund Transfers

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Comments:

Thank you for the opportunity to comment on the proposed rule changes to Reg E.

Texans Credit Union agrees the concept of an opt-out program is preferable from an administrative standpoint to the suggested opt-in or hybrid approach. Texans has offered an opt-out for our courtesy pay program to our membership for several years. However, the proposed opt-out change introduces operational challenges in managing the program across the various credit union delivery channels such as debit, ach and check in-clearings. For example, Texans is not aware of a core processing vendor with the current technology to support an opt-out solution by delivery channel, nor can our processing system distinguish between recurring and one-time POS transactions. These rule suggestions would require technological enhancements not currently being considered by our core processing vendor, and which would have to be developed. Due to the impact this proposed change has on the core processing vendors and the credit union's processes, the implementation timeframe should be at least one year.

In addition, offering a telephone opt-out solution does not provide a sufficient record and audit trail of the transaction and Texans strongly recommends the telephone opt-out not be allowed.

Ms. Tanya Patterson  
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Texans Credit Union