

From: Alhambra Credit Union , Debra McConnell
Subject: Reg Z - Truth in Lending

Comments:

ATT: Federal Reserve Board

At Alhambra Credit Union all of our loans are open-end. The 21 day notice requirement would drastically affect our operation. Our credit union members have loan payments due on various days of the month to coincide with their payroll date. Members pay monthly, semi-monthly, bi-weekly, or weekly. Members appreciate that they can have their payment date set with their payroll date.

We are a small credit union (\$17 million in assets) and the expense to change our statement cycle to issue monthly statements to all members with loans would be a hardship on the credit union and would result in an expense to our members. Many members have their payment sent in by payroll deduction, automatic transfer or ACH. Members expect the payment to be made automatically on that date. To change this would also cause confusion and complaints that the due date does not coincide with their payroll date. It would also cause additional expense to the credit union to have our data processor change the due dates and payment frequencies on all of our loans.

Credit unions have served our members with open-end loans for many years. Please reconsider to have this Credit Card Act only apply to credit cards, not to all open-end loans.

Sincerely,

Debra McConnell