

From: Marylin Ball-Brown
Subject: Reg Z - Truth in Lending

Comments:

Dear Chairman,

Our 26M asset credit union strives to offer excellent member service and part of that service includes a fast turnaround on loan requests. The reason we can provide this service for our members is our multi-featured open-end loan plan. With this plan our members are able to call us and get approval for a new car or money for a vacation and have the funds deposited in their account without having to come down to our office. We only have one branch and it is not always convenient for our members to come in to the branch, especially members who live out of state. Our open-end loan program has given us a way to compete with other larger financial institutions. Our open end program is set up to afford our members the most convenience for them so, as a result the due dates on these loans were set according to our member's wishes. This means we have due dates on our loans on every day of the month. These loans are not set up to cycle like the credit cards. Our credit card programs are ALREADY in compliance with this Act.

We understand the new Credit Card Act was intended to stop predatory actions and the raising of interest rates for no reason or for one late payment, and other penurious actions the banks have employed in their credit card portfolios in the past. We applaud that action. However, the credit union system has not been doing these sorts of things and our programs that have been benefiting consumers for many years without concern have now been included, as an add on in committee, in this legislation with no time for a comment period before the implementation date. The August 20 deadline, because our programs are not on a payment cycle like credit cards, is very unreasonable as it doesn't allow us enough time to code our systems to comply with this Act.

We respectfully request that you reconsider this early deadline and give us more time to work with our data processors to figure out the best way to comply with this regulation.

Thank you,

Marylin Ball-Brown