

From: J.C. Higgins
Subject: Reg Z - Truth in Lending

Comments:

We are a \$16 million dollar credit union with a small staff of four and 2,300 members. The changes we have to make in our computer system are beyond our expertise. A third party vendor is making the changes and the cost, though substantial, is unknown. Their answer is "it will be what it will be". In fact, with such a short time table even our expert IT vendor isn't sure if the required timetable will be met.

The staff is in a holding pattern as we wait to find out the changes in operational procedures and the new software. Processing and mailing costs for statements alone are projected to increase 140%. Most internal procedures will have to be reviewed as we now anticipate the effects of mailing monthly statements, potentially having to manually change payment types, dates, automatic distribution systems, and re-educating our members. Total staff time cannot be estimated and over-time may be required depending on the timing and complexity of the software system change components. There is no simple fix!

We have no reasonable understanding of the total time frame needed to complete these tasks to meet this extremely short compliance deadline for this complex series of rules. I would ask that you delay implementation. Most often the only result of unreasonable time frames is higher cost and inefficiency.

Sincerely,

J.C. Higgins