

From: Jenny Rivers
Subject: Reg Z - Truth in Lending

Comments:

The Honorable Ben S. Bernanke
Chairman
Board of Governors of the Federal Reserve Board
20th and C Streets, NW
Washington, DC 20551
Re: Interim Final Rule Implementing the Credit Card Accountability
Responsibility and Disclosures Act

Dear Chairman Bernanke,

On behalf of the Michigan State University Federal Credit Union, I am writing to you to respectfully request that the Board delay compliance with the 21 day notice provisions for open-end plans other than credit cards set to take effect August 20, 2009 under the Board's new interim final rule implementing the Credit Card Accountability Responsibility and Disclosures Act of 2009 (Card Act).

The Michigan State University Federal Credit Union services over 150,000 members in all 50 states. The final interim rule has severely affected our ability to provide good member service and is causing horrendous internal problems as we seek to make good faith efforts to comply with the 21 day notice provisions for all open-end loan plans, which include general loans, signature loans, home equity lines of credit, and other loans permitted under open-end lending.

This provision prohibits us from treating payments as being late, which will mean we cannot file a credit report, must advance additional credit, and may not charge a late fee even if the payment was late. Because of this rule we may elect to stop reporting our members' loan information to credit bureaus. This will harm the credit standing of most of our members. We want to comply with all legal requirements, but these provisions have created severe implementation problems.

Our members prefer consolidated statements, as opposed to receiving multiple statements as in the banking industry. They often chose bi-weekly payments and designate their due dates to coincide with their payroll deposits, all of which will need to be changed in order to be in compliance. This will be extremely expensive and the costs will have to be borne by the credit union membership. Due to the significant impact of the issue to our credit union and rapidly approaching effective date, we urge you to suspend the implementation date in order for the credit union to comply in the most cost effective manner without undue hardship.

Sincerely,
Jeffrey Benson