

From: Mary Hutchinson
Subject: Reg Z - Truth in Lending

Comments:

Date: 08/06/2009

The Honorable Ben S. Bernanke
Chairman

Board of Governors of the Federal Reserve Board
20th and C Streets, NW
Washington, DC 20551

Re: Docket R13-64 - Interim Final Rule Implementing the Credit Card
Accountability Responsibility and Disclosure Act

Dear Chairman Bernanke:

On behalf of U.S. First CU, I am writing to you and the entire Board of Governors 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 Disclosure Act of 2009 (CARD Act).

Please delay the implementation of the 21-day rule. We need additional time to work with our data processing vendor to implement the necessary changes. Our credit union is facing tremendous operations problems in order to comply on such short notice with this rule, which include general lines of credit, lines of credit associated with share draft and checking accounts, signature loans, home equity lines of credit and other types of loans permitted under open-ended lending. In addition, these required changes will be extremely expensive, and these expenses, which are compounded because of the short time frame to comply, will ultimately be born by our members.

This is not something we can do ourselves. The change requires assistance from various data processors (credit card, consumer loans, etc) and coordination with our statement processor. Additional time is necessary.

We want to continue to provide members with a consolidated statement for ease of reading, lower mailing costs and to save on paper. Again, additional time is necessary.

In light of these problems, it is critical that the Board use its authority under the Truth in Lending Act, as it has when implementing previous TILA amendments, to allow more time for credit unions such as U.S. First CU to comply with these provisions so we are not subjected to needless legal challenges.

While we urge the Board to provide more time for compliance, we also respectfully request that the Board permit credit unions to continue to use consolidated statements by placing on each member's monthly statements the dates on which all covered payments are due in the current month and the next month; this will ensure that our members receive at least 21-day notice for all open end payments.

Thank you for your consideration to this critical matter.

Sincerely,
Mary Hutchinson