

From: Credit Union of Dodge City, Karen Hamit  
Subject: Reg Z - Truth in Lending

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Comments:

We are a credit union that has 10,500 members and assets of 52,435,000.00. We do all of our in house loans for vehicles, boats, signature notes, campers, and several other items on an open end line of credit note. It is convenient for our members because they can sign one time and then continue to qualify for other loans without the heavy paper work. These loans are set up to come due 30 days from the date they sign the note. That means that we have loans with due dates on every day of the month. Our members can then pay their payments weekly semi- weekly or monthly as long as they have the entire payment paid on the due date. It is a convenience for the member and it helps them to make their payments without coming up with the entire amount on one day that does not fall near their pay period.

This new regulation Z does them no justice. It has been suggested that we just set all their payments to come due the 28 of the month. Many of our monthly pay members set the date to work with their pay check. This new regulation is an injustice to them. We have tried to get our data processor involved and they can not seem to come up with a program to notify our members with the proper periodic statement on a daily basis. We have sent out our first batch (by hand) to cover the first few days of August and it took 5 employees 7 hours of overtime to complete the process. Plus we are doing this by hand and that leaves room for error which also is not to the advantage of our members.

Please reconsider taking the open end lending out of the regulation as quickly as possible. This is unfair to many credit union members in all the states across our country.

Karen Hamit  
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