

From: Tamara Restivo
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 Sacramento District Postal ECU , 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).

Our credit union is the oldest credit union in Sacramento and with the environment and the state of our economy, we are struggling already before having to put out the extra expenses for such short term notice of this regulation.

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.

Our data system and our internal operations is not prepared to handle such changes in regulation in such short term. The costs associated with making such changes is astronomical for a small credit union to absorb. The end result is a landslide to the membership.

Our membership values the service they get from their credit union and to make such a change in the way they receive their periodic statements would really frustrate them. The added costs take away from the dividends they receive and the interest rates offered on their loans.

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 Sacramento District Postal ECU 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,
Tamara Restivo