



GULF COAST FEDERAL CREDIT UNION

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August 6, 2009

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

**Re: Interim Final Rule Implementing the Credit Card Accountability Responsibility and Disclosure Act
To Whom it May Concern:**

I am writing to respectfully ask that the Board of Governors 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.

Gulf Coast Federal Credit Union is a full-service community credit union, which has been in operation for 69 years. We have approximately 9337 members, 44 full-time employees and \$75 million in assets. We are facing numerous problems as we try to implement a plan to comply with the 21-day notice for all multi-featured open-end loans. Currently we mail quarterly statements on all our loans and monthly statements on share draft accounts or any account that is affected by an electronic transfer. Since we do operate with such a small staff, the burden of adding monthly statements for all open-end loans would be tremendous. Cost of possible additional staff, statement paper, envelopes, toner and postage to name a few.

Our membership has come to expect the convenience that Open-End lending provides. We have several members who add to their Open-End Personal loan monthly to enable them to pay necessary bills until they receive their next paycheck. If we were forced to change to Closed-End lending due to the passage of this bill and its negative effect on multi-featured open-end lending, this could drive our members to predatory pay-day lenders who charge an astronomical interest rate. We also have members who have their payments set up for semi-monthly or biweekly payments to enable them to match payment due dates to their paychecks. Forcing them to change to monthly payment due dates, again to comply with the law, would impose undue hardship on the borrower. The very bill that was intended to have pro-consumer legislation would actually become anti-consumer.

The board and staff of Gulf Coast Federal Credit Union have worked diligently to provide a safe, anti-predatory lending environment for our member/owners. I urge you to at a minimum, delay implementation of the new interim final rule for several months so credit unions, data processors and the members can sort out these complex issues.

Thank you again for the opportunity to express my comments and concerns on this critical issue.

Sincerely,


Debby McGee

V.P. Operations/Branch Coordinator
Gulf Coast Federal Credit Union 361-986-4020