

From: First Community Union, C.P.Webb
Subject: Reg Z - Truth in Lending

Comments:

I am a director with First Community Union credit of Houston Tx . We are a half billion dollar plus CU with over seventy thousand members . Our contact is rdowning@fccuhouston.org. The 21 day rule rule would cause many difficulties and would be costly as well as it could cause many other burdons. Preserving the current operations of open end lending is a benifit to our membership and they would be uphappy if we could not offer it. If consumers had to switch from weekly or bi- weekly payments,it raises interest cost on our members. The Credit Union does not participate in any predatory credit card practices. Should we have to change the practices that have worked exceeding well for over 30 years. I hope that at least this regulation could be delayed for several months so that these complex issues could be sorted out by data processing an the members. At least give us time to comply. Thanks C.P.Webb