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The regulation, intended to combat unfair and deceptive acts and practices on open-end credit card accounts is overly broad and has had unintended consequences. The regulation affects all open-end credit plans, including those used by credit unions for fixed payment collateralized and uncollateralized consumer loans. Credit unions utilize open-end lending plans for consumer loans as a consumer friendly way to facilitate multiple advances under a single lending plan. Loans are set with various payment frequencies, such as weekly, bi-weekly, semi-monthly and monthly. Payments that occur more often than monthly enable members to reduce the interest expense over the life of the loan. Many of our members have their loan payment frequency tied to their payday frequency as a management tool. The 21-day requirement for the advance notice of open-end loan payments reduces members choices in selecting their open-end loan payment due dates. This regulation also affects automatic payments. Not being able to select a loan due date based on an automatic payment schedule, creates money management issues and additional interest for some members. This could lead to a negative impact on our members' which could include lower credit bureau scores, higher fees, and ultimately affect their ability to secure future new loans.