

From: "Steve Salzer" <SSalzer@pscufs.com> on 12/16/2005 08:55:01 AM

Subject: Truth in Lending

Dear Sir or Madam:

On behalf of PSCU Financial Services, Inc. ("PSCU"), a credit card and debit card servicing provider to over 500 credit unions throughout the United States, we are submitting these comments to the Board's second ANPR regarding implementing the Bankruptcy Act of 2005's amendments to the Truth in Lending Act.

We believe that the additional disclosures proposed by this ANPR would be costly and would require extensive system enhancements. Our biggest concern is that 12 months would not be enough time to implement all of these changes for our clients. We respectfully submit that the effective date should be extended to a date that is 18-24 months from the date the final rule is published.

Sincerely,

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