

R-1247



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February 24, 2006

Board of Governors of the Federal Reserve System
Jennifer J. Johnson, Secretary
20th Street and Constitution Avenue, NW
Washington, DC 20551

Dear Ms. Johnson:

I would like to take this opportunity to comment on the Interim Final Rule, Regulation E (Electronic Fund Transfers).

Our credit union does not provide payroll card accounts and/or services at this time.

Since a payroll card may be the only relationship a member or customer may have with the financial institution, the interim final rule that gives financial institutions the option to provide, in lieu of a periodic statement, a written history of account transactions upon a consumer's request seems a reasonable compromise. At this time we do not plan on offering this option.

Our credit union does not believe that certain information should be excluded from the history of account transactions provided to consumers.

Our credit union believes that providing consumers with a rolling history of 60 days' worth of transactions is feasible as long as the previous 7 days are excluded due to processing request delays.

We do not believe that any additional transaction information should be provided to users of payroll card accounts.

We feel that the interim final rule, the 60-day period for liability limits and error resolution rights begins to run on the date that a consumer electronically accesses his or her account, is reasonable.

There may be no way to determine when a consumer has electronically accessed his or her account but by entering the pin number, the inquiry is then accessed and measurable.

Our credit union does not suggest any other means for triggering the 60-day time period for liability limits and error resolution rights.

Sincerely,

Frank E. Berrish
President/CEO

