

**From:** "Gene Pittman" <genepittman@sbcglobal.net> on 10/09/2007 04:20:01 PM

**Subject:** Truth in Lending

To: Board of Governors of the Federal Reserve System

REF: Docket No. R-1286

October 9, 2007

Dear Sir:

Pollock Employees Credit Union, which is in Dallas, TX, objects to the Regulation Z proposed changes that affect multi-featured open-ended lending rules.

The current multi-featured open-ended lending rule has been in operation for more than 25 years and has worked well. This credit union has been using it that long and relies on it help meet the needs of our members. The current flexibility of the system allows for faster processing and disbursement of lending requests. As a small credit union, this helps us to compete with the larger credit unions and banks. We also have limited staff, and open-end lending saves us both time and money. It allows our members to pay lower finance charges and helps them get their funds quickly.

Under the current system, our members receive adequate disclosures and rely on this credit union to be available for them when they have an emergency. Changes to the system will create more unnecessary paperwork and cost a significant amount of money to set up. With only two employees serving over 1,300 members, that will be quite a hardship on the credit union. This will likely cost our members more in the form of higher interest rates, and the increase in processing time will slow down the system of getting them their money in a timely manner.

From a consumer and financial institution standpoint, we are unsure why it is necessary to change our current system. I have managed a credit union under a closed-end system, and the current system is much more efficient, less costly, and it goes a lot further in meeting the needs of our members. We are a small business, and the changes you propose will hurt our credit union from both the administrative and the service aspect.

As I stated earlier in this message, Pollock Employees Credit Union objects to the Regulation Z proposed changes that affect multi-featured open-ended lending rules.

Sincerely,

Gene Pittman  
Pollock Employees C.U.  
President