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Comments:

The University of Kentucky Federal Credit Union (UKFCU) located in Lexington, Kentucky prides itself on helping members achieve financial well being. Founded in 1937, we primarily serve the faculty, staff and students of the University of Kentucky and Eastern Kentucky University. For UKFCU to be able to compete in our financial market, open end lending provides the opportunity to service members quickly, effectively and efficiently across the United States. This streamlines the account opening and lending processes especially for those members who have moved away from the Lexington area. We are able to take care of their needs within minutes via every method of communication. This process would take days if these proposed changes take place; thus leaving us unable to serve our members in a timely and efficient manner. Currently UKFCU does not participate in closed end lending. We are extremely concerned about the costs involved in making this change. Some of these changes, not limited to, include changing all of our forms, re-training staff and performing system enhancements not to mention the additional postage costs. UKFCU is in agreement that changes need to be made to Reg Z Truth In Lending regarding predatory credit card financing; however for consumer open end lending (non-credit card) reg changes should be differentiated and not classified in the same manner. For example, we offer signature based unsecured loans with a maximum term limit. If the member would like to increase or borrow additional funds, it can be added to this existing loan with a short application and credit file review. The member does not have to physically come into the credit union and or sign forms via mail, enabling the credit union to provide the utmost service.