



SOUTHERN FEDERAL CREDIT UNION

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October 11, 2007

To: Board of Governors of the Federal Reserve System

REF: Docket No. R-1286

To Whom It May Concern:

I am writing to you today to comment on the Federal Reserve's proposed changes to Regulation Z pertaining to multi-featured open-ended lending rules.

Our credit union has offered open-ended lending plans to our members since 1954. Our members have come to rely upon the convenience of our open-ended lending program. The current system allows for faster processing and disbursement of lending requests. I am not aware of any complaints from our members about our current open-ended system, nor have they expressed confusion about how our program works. Our members always receive the proper disclosures with their loans.

The changes as currently proposed will create more unnecessary paperwork, and cost a significant amount of money to implement. The processing time for loans will also increase, especially when our members live throughout the U.S. We do not want to have to pass these increased expenses (and inconvenience) on to our members.

If this proposal passes we will also lose a lot of our core lending business, auto loans, to auto dealers who are not in the business of looking out for our member's best interest.

It is for the reasons cited above that we are officially opposed to the proposed changes to multi-featured, open-ended lending. Thank you for your attention to this matter.

Sincerely,

Jeanne Walker
President