

**From:** "Shawn Nelson" <SNelson@mccu.org> on 10/12/2007 11:35:03 AM

**Subject:** Truth in Lending

October 12, 2007

To: Board of Governors of the Federal Reserve System

REF: Docket No. R-1286

Dear Sir:

I am writing on behalf of myself as a credit union employee and member as well as on behalf of all of the members that I serve everyday to oppose the proposed amendments by the FRB to the open-end credit rules under Regulation Z.

Credit Unions have used the current open-end lending system for over 25 years without incident. Our members get adequate disclosures now under the current system and have relied on this way of financing their loans for years. Changing the system will cause major disruptions to current credit union business practices and working relationships with our members. The proposed changes will create more paperwork, unnecessarily. The changes would also cost significant money and take significant time to implement.

Credit Unions have been able to manage delinquency very well with the relationships they can build by offering the convenient Open-End Lending procedures. Credit Unions build trust with members by providing the most convenient form of lending while protecting the credit union by updating information when needed.

Credit Unions are known for their consumer friendly financial products and services they provide to members not only through great rates but also the convenience and service provided to meet their members lending needs. If the proposed regulations go into effect credit unions and more importantly its members will lose the convenience and low cost they currently enjoy.

From a credit union member and employee perspective, I am unaware of any issues that would warrant making changes to Open-End Lending systems that are in place and remain very effective. The proposed suggestions/changes seem like a solution in search of a problem.

Sincerely,

Shawn Nelson

Shawn Nelson  
Vice President of Lending and Product Delivery  
Members Choice Credit Union  
281-754-1101  
snelson@mccu.org

