October 12, 2007

DOCUMENTATION SENT VIA E-MAIL: regs.comments@federalreserve.gov.
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Attn: Jennifer Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue N.W.
Washington, D.C. 20551

REF: Docket No. R-1286

To Whom It May Concern:

I am writing to you today to comment on the proposed changes to Regulation Z, specifically, as they apply to multi-featured, open-end lending programs.

Southwest 66 Credit Union has offered open-ended lending to our members for 15 plus years. The current system has worked well for us, and we have received no complaints from our members on disclosures or processes associated with our open-end lending program.

To change these processes as proposed would seriously disrupt our ability to provide convenient loan options to our members. If the rules regarding open-end lending were to change, our members would in many more cases have to conduct business in a branch, and this cause them inconvenience to their daily activities.

If the Federal Reserves' changes to Regulation Z come to pass, then we would have to modify our lending procedures and operations. This will require greater expenses in the form of staff training, new software, and new forms. We do not want to pass these costs along to our members in the form of increased expenses.

It is for these reasons that Southwest 66 Credit Union would like to go on record as opposed to the proposed changes to Regulation Z, specifically, changes pertaining to multi-featured, open-end lending programs.

Sincerely,

SOUTHWEST 66 CREDIT UNION

By:_____
Paul T. Elkins
President and
Chief Executive Officer