

From: "Evie Blackwell" <evie.blackwell@gmail.com> on 10/12/2007 01:15:05 PM

Subject: Truth in Lending

I've reviewed all of the redesigned forms, but I still find some information lacking over certain aspects for the terms of the contract. I think a statement over the length a penalty period can last (and what it takes to get out of it) and the terms it will revert to will be most important, along with the stated date for the minimum window the terms of a credit card can be changed, for any reason, long term. If a bank tries to go back on agreed terms. This capricious behavior must be defended against.

This biggest part that is still lacking is the determination and handling of the APR and the window of statement of how long the terms officially should last on a balance statement. The calculation of the terms and the means one can improve said terms should also be available. The default setup doesn't exactly encourage or reward consumers for being responsible and diligent.

In fact, I've discovered that as I've become a responsible consumer, with no revolving balances each month that all of my credit card companies have decided to change the terms of my credit card fees schedule and penalize me further for being responsible with my credit card usage. The terms basically say, accept the changes to the fee schedule or cancel the account. Everything was changed, from international purchases surcharges being increased (I do business with the UK and Canada, let alone the market rate for the transaction is not charged if it is not USD), the minimum annual fee tripled, and APR increased, and a 'research' fee was added. If I request any information from there end from receipts to statements, it will cost me \$7 per item of paper. Imagine the cost I would incur if identity fraud occurred or my card was stolen! Ironically, the card with the lowest APR now has decided to make it less affordable than my higher APR cards. And, of course, cancelling those credit cards and seeking new cards would adversely affect my credit score. It is never in the interest of the consumer to close a credit card when even when the fees for merely holding the credit account, due to the affects it has on the total credit issued to a consumer.

Which leads to the issue of credit scores. Currently the free, consumer, availability is an annual prospect. I suggest that it be available quarterly, given the wide spread impact it has on the typical consumer's lives, as well as for verifying account activity and preventing identity fraud. The more informed a consumer can be the greater potential for responsibility. Also, the credit score formula is a closely guarded secret that is always on the side of the credit agencies with nil for transparency. This also needs to change to make a more equitable relationship between the agencies and the consumers. It isn't in their interest to have perfect consumers, it is in their interest to charge higher rates by any means necessary.

I cannot attest to being a financial advisor, but at least a dutiful consumer of said services. If credit were not so vital to obtain a loan or have a standing in life, I would swear it off completely.

I hope this feedback is most useful,
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