



September 19, 2007

Jennifer J. Johnson
Board of Governors of the Federal Reserve System
20th Street and Constitution Ave, NW
Washington, D. C. 20551

Docket No. R-1286

Dear Sirs:

Thank you for providing us with the opportunity to comment on the proposed amendments to Regulation Z regarding improvements to the effectiveness of disclosures received by consumers/members in connection with credit card accounts and other revolving credit plans.

We have reviewed the proposed changes thoroughly and fully support the full and fair disclosure of information to consumers/members in connection with any type of lending activity, however we believe the changes outlined in the proposal could have unintended consequences to consumers/members that currently enjoy the benefits of utilizing an open ended lending system. Below are a few examples of the type of negative impact that would occur:

- Less convenience in connection with future loans as these changes may cause lenders to move to a closed end lending platform, requiring new documents to be signed each time a loan was obtained. Thus increasing the time connected with obtaining the loan, possibly increasing the cost of the loan to the consumer/member as the lender would find it necessary to hire additional staff to handle the increased interaction with the consumer/member and paper work necessary to finalize the loan transaction.
- Potential to increase the interest rate on the initial loan if an open ended system continued to be used, but without the ability to re-underwrite each new request as the lender would have to price for the potential risk related to changes in the credit standing of the consumer/member.
- Reduction in the amount of credit available to consumers/members as lenders may determine they are unwilling to take the risk on those with impaired credit at the time of

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initial application. This could also have the impact of increasing the cost of these loans for consumers/members as it would limit the pool of lenders willing to offer credit to these consumers/members.

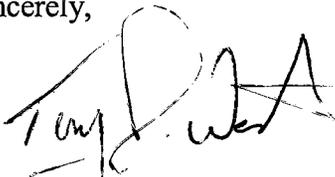
- In the State of Florida moving to a closed end note would cause the consumer/member to be subject to paying intangible tax on the loan amount, thus increasing the costs of borrowing.

There would also be a substantial cost impact to those lenders using open ended lending systems to move to a closed end system which would include increased staffing to handle increased consumer interaction, paper work follow up, computer system changes, document preparation and training impacts.

Additionally as the closed end lending section of Regulation Z is scheduled for review in the near future, we are concerned any changes there will once again impact consumers/members that had initially worked with a lender using the open end lending system and converted to closed end as a result of earlier revisions to Regulation Z, related to open end.

As a credit union, we are committed to serving our members in a cost effective, efficient manner to allow us to pass the savings back to them. Thank you for the opportunity to share our concerns and comment on these proposed changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry R. West". The signature is stylized and somewhat cursive, with a large initial "T" and "W".

Terry R. West
President/CEO