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Proposal: Regulation Z - Truth in Lending

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Comments:

With the new proposed changes to Regulation Z, Yavapai Federal Credit Union and all credit unions will be forced to reduce the variety of products provided to members, thereby losing income and decrease effectiveness with members by passing the expenses for editing to them. Members have grown accustomed to the simplified lending process of a credit union. With the proposed changes members will be imposed upon to deliver additional documentation to fulfill their lending needs. With the proposed changes a review of the ability for the member to repay a loan can not be completed. With the proposed changes a borrower may advance when they financially may not be able to repay. Solution: Eradicate open-ended lending. This creates a situation whereby the credit union is limited in the products provided to its members and therefore losing income. With the proposed changes new documentation and training will have to be completed along with editing current information. This not only cost ineffective but will require the credit union to pass this newly generated expense to the members. Yavapai Federal Credit Union would like to request the denial of the proposed changes to Regulation Z which creates poor member service and reduced income!