

Date: Oct 11, 2007

Proposal: Regulation Z - Truth in Lending
Document ID: R-1286
Document Version: 1
Release Date: 05/23/2007
Name: Rich n R
Affiliation: attorney
Category of Affiliation: Other
Address: not offered in public
not offered in public
City: Houston
State: TX
Country: UNITED STATES
Zip: 77002
PostalCode:

Comments:

"§ 226.9: Subsequent disclosure requirements" of the Truth in Lending Act addresses creditors' changes in terms. Regulation Z was created before the internet was prominent in consumers' lives though. Isn't it time to require that credit card companies finally disclose, ON THEIR (INTERNET) WEBSITES (through the borrowers' personalized & confidential account interfaces), policy changes from which individual borrowers may opt out in a timely manner? Currently lenders can merely postal mail an opt-out advisory to a borrower without even notifying the borrower online. So if timely news of the pending opt-out opportunity does not arrive via the postal monopoly, the borrower's failure to "opt-out" in time can result in (for example) a sudden doubling of interest rates and monthly payments due. Currently the lender is still legally off-the-hook and essentially immuned from potential lawsuits in such a scenario because of Regulation Z (which was drafted before the internet was prominent in consumers' lives and in our economy). It's profitable for the lenders that we continue to allow this but our record high \$9 trillion dollar national debt suggests that taxpayers will increasingly need as much efficiency and fairness in their credit-related lives as possible. Why shouldn't we finally remedy this?