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Comments:

I want to add a comment in favor of the proposed regulations. Credit card issuers have been taking increasing advantage of consumers over the last 20 years, to such a degree that regulatory action beyond the proposed rules is necessary. The Board is aware of the extent that consumer credit use has increased in that period of time.

Perhaps because of the increased use, card issuers have not felt competitive pressure to treat their card holders fairly, especially those who experience financial difficulty and thereby become susceptible to the practices that the proposed rules would prohibit. Let me be more precise. The card issuers have preyed upon the lower end of the credit score pool, both by inappropriately soliciting that market with mass mailings and offerings of credit [with no credit underwriting], and then when those card holders run into repayment trouble, imposing "over line fees, over draft fees, late fees [at \$35 per occurrence], ad nauseam. The card issuers are more than willing to impose such charges because that portion of the market has no one to speak for them. Of course, the imposition of such charges increases the likelihood that a particular card holder will give up trying to work their way out of financial difficulty, and default to a bankruptcy filing ...

assuming they can get relief from the bankruptcy laws that were amended recently at the bequest of the same credit card industry that has abused a segment of the market it supposedly "serves." In sum, I write in support of the proposed rules, and ask the Board to continue to monitor and make further rule changes concerning card issuers since the courts have freed issuers to charge interest rates that bear no connection to market rates of interest, the profitability of credit card products is outrageous without the over-reaching application of fees and charges by the industry. Respectfully submitted, Craig Reinhardt