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**Proposal:** Regulation AA - Unfair or Deceptive Acts or Practices

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**Comments:**

The proposal doesn't go far enough in protecting consumers. There are two practices by credit card companies that should be outlawed. Those are: Not applying any payments to cash advances as long as there is an outstanding purchase balance, yet charging monthly interest on the cash advance; and showing available credit, excluding the computed interest, then charging the consumer an overlimit fee when the interest added (not a purchase) pushes the card over the limit. That means the consumer would have to be able to calculate the interest on any given day during the monthly billing cycle, (an impossible task), and subtract it from the available credit to obtain the true available credit amount. Consumers should pay an overlimit fee for purchases, but not for fees and interest imposed by the card issuer. I have seen some cards add interest, push the card over the limit, then charge an overlimit fee the next month for a previous overlimit fee. To be fair, the available balance needs to be reduced by pending interest charges, just as it is for pending purchases that haven't yet been billed.

