

**Subject:** Regulation AA

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

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**Comments:**

This proposal will, if enacted, cause a decrease in the availability of credit to the consumer. It reduces the ability of the credit card companies to price loans for risk and make changes when the risks for a specific account changes. This rule will eliminate the profit making ability of the card business model and invert the risk/reward model. All of the risk will be held by the credit card company and the customer will have limited downside for poor credit management behavior. I can see a future where we have limited credit available and all accounts will again be paying an annual fee. I oppose the passage of this proposal.