

From: "Rufus Baker Jr" <thebakers13@newwavecomm.net> on 07/24/2008 11:05:08 PM

Subject: Regulation AA

Dear Fed,

I am a commercial banker, and have been in the banking profession for over 20 years. You are currently considering changing the laws regarding credit card issuers fees and charges. There are several things that the credit card companies do which are in my opinion unfair practices.

In my loan documents for a commercial loan, each responsibility of the borrower is spelled out exactly, and the promise by the bank to live up to the original loan document's tenants is made clear also.

However, when I look at the disclosures for credit cards, there are covenants which allow the credit card company to change there original agreement almost at their will.

Some of the unfair practices involve Double-Cycle billing, Unfair payment applications, Arbitrary due times, "bounce" protection, bait and switch offers, charging overdraft fees based on holds. These are all unfavorable charges, fees, and practices.

I feel that the most heinous practice is that of "Retroactive Re-Pricing". According to some credit card agreements, if a customer is always on time with their payments, yet they are late on another bill, from an unrelated company, if the credit card company finds out about the customer being late, they can raise the rate on their credit card.

Gee, wouldn't that be great if I told one of my commercial customers that I was raising the rate on their CRE loan because their business credit card had been late!

I still can't understand how the Federal Reserve on another governing agency hasn't stopped this practice before now.

Please change the regulations to prohibit these practices, especially "Retroactive Re-Pricing".

Thank you

Rufus Baker, Jr

Integra Bank

Commercial Relationship Manager

Madisonville KY