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Secretary Jennifer J. Johnson  
Board of Governors  
Federal Reserve System  
20th St. and Constitution Ave.  
Washington, D.C. 20551  
RE: Docket No. R-1314

Dear Secretary Johnson,

In my opinion, I feel that the Federal Reserve should not interfere with the practices of subprime lenders like First Premier. Their practices have been successful for individuals who are honestly trying to reestablish their credit. For me, having a First Premier card for a year really helped me to obtain a better credit rating. When my one-year anniversary with First Premier came around, I paid it in full and "graduated" to a more traditional credit card with a larger spending limit.

First Premier continued to keep my credit limit at a low rate, which made it possible for me to pay my monthly balances in a timely manner. They showed me that it was in my best interests to maintain a low credit limit so that I could easily get my credit into good standing. With their help I was able to reach that goal and for that I am grateful.

Naturally, any financial institution dealing with consumers with poor credit will have some extra fees. I am sure those practices are in place because these individuals are considered high risk. First Premier must cover their costs, and maybe this is why the Federal Reserve seems to have a problem. I had a positive experience with a subprime lender and I believe that people who truly want to establish or reestablish their credit should have the ability, without any governmental interference, to turn to credit card lenders like First Premier for that chance.

Regards,

Allison Phelps