

**Subject:** Regulation AA

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I heard on the news that you are considering regulation of the credit card lending industry. It's timely and about time! I would like to express my support and request that you address areas that have become manipulative, punitive, and, in my opinion, fall into the area of usury: 1. Changing of due dates on accounts so that the unsuspecting borrower is caught unawares and late fees can be assessed. 2. Excessive late fee rates. 3. Raising of loan rates retroactively--to charges that have been made under lower rates. 4. Raising loan rates because of "late payments" on other credit cards. 5. Loan rates of 20+ percent. 6. Excessive and "creative" loan fees. 7. Applying payments first to the balances that have the lowest rates. 8. Charging interest on the average of 2 months of balances, effectively doubling the interest rate charged. These practices used to be thought of as crooked, misleading, and dishonest. I thought that such victimization of the ordinary person had ended with the onset of the 20th century. In borrowing on a credit card, people are really taking out a contract for a loan. For the lending company to change the rules, rates, and due dates capriciously is dishonest, to say the least. What has happened to the integrity of our banking industry? If they will not control their greed and persist in taking advantage of people who, in good faith, take out a contract for a loan, some governmental regulation is required.  
Sharon H. Erickson, PhD