

White Rose Credit Union
3498 Industrial
York PA



To: The Federal Reserve Board of Directors
RE: Comment on the Credit Card Accountability and Disclosure Act of 2009

To Whom It May Concern:

After spending many hours trying to accomplish the task before us, we have concluded that the 21-day periodic statement ruling for non-credit card open-end consumer loans was ill conceived. Our Credit Union prides ourselves with our ability to effectively offer products to the working poor. This ruling will cause harm to our relationship with those who need our services and in the end harm their financial stability.

For years we have taught budgeting tools that have helped members stay on track with their bills. A weekly payment that matches a member's paycheck is immensely important to developing sound financial habits. This new 21-day rule makes it impossible to disclose weekly, bi-weekly or semi-monthly payments.

Second, the ruling will eventually cost members money. We know if you pay your bills weekly, bi-weekly, etc. you save money over time. By including non-credit card open-ended consumer loans to this 21-day ruling, congress has over-shot its mark. We have turned a good piece of consumer legislation into something that will harm the exact individuals it was originally drafted to protect.

Finally, the 21 day notice contemplates the need to move due dates as a "catch-up" provision for individuals with other than monthly payments. This represents most of our non credit card open-end consumer loans. These members were given previous disclosures that are now not appropriate in light of the new ruling. Yet we are asked to retroactively and without any real guidance from this ruling cause the members disclosures to become inaccurate. As we understand the ruling, the only way to avoid future legal concerns (particularly as they relate to Real Estate transactions) is to have the members come into our credit union to sign a new disclosure. But there is not enough time to explain the new rule and since the request is being mandated, most members will look at this demand as a breach of trust. If the member does not voluntarily sign this new disclosure and we move their due dates without their approval, we can clearly see problems should we be required to take collection actions. If we don't move their due dates we violate this ruling. Either way the credit union cannot fulfill our legal obligations.

Sincerely,

Brad R. Warner, CEO
White Rose Credit Union