

From: Via Credit Union, Dick Kibbey

Subject: Reg Z - Truth in Lending

Comments:

Federal Reserve Board:

Please consider delaying the effective date of the 21 day rule (for statements to be mailed prior to the payment due date) with regard to open-end credit that is not credit card related in the Credit Card Accountability and Disclosure Act of 2009. Perhaps delaying until January 2010 would allow adequate time for data processing adjustments to be made or, perhaps, time for the Act to be amended to remove this requirement. Please use your substantial authority and influence to support an amendment to this Act which would remove its applicability to open-end loans or LOC's that do not have a credit card associated with them.

Thank you,

Dick Kibbey
Via Credit Union