

From: Pantex Federal Credit Union, Cliff Murley
Subject: Reg Z - Truth in Lending

Comments:

Dear Board members,

I would like to ask that the Board reconsider extending the implications of the CARD Act to multi featured open ended lending and beyond credit cards. Our credit union has been using this type of open ended lending plan for all consumer lending (excluding Real/Estate) simply for the convenience it provides our members over conventional closed ended lending process. This legislation will not just impact our credit card loans, but all vehicle, line of credit and personal loans as well. We do not calculate an open end limit amount that we will loan to the member, we use the plan to simplify the loan process for subsequent loan advances under the master open end plan agreement.

By requiring the 21 day periodic statement provision, we have very limited choices to comply. One is to move all member payment due dates to a single day of the month to allow one statement cycle for all to receive a statement 21 days prior or to produce daily statements to correspond with the 21 day window. Either solution will be costly and almost impossible to implement prior to the August 20th deadline. The implications to move the borrower's payment due date will cause significant financial impact to individuals who need the loan payment date to correspond to their household pay days. The reputation risk of this solution is incalculable.

Generating daily statements is our only alternative, however software vendors have informed us that there is no way they can reprogram the software in time to meet the August 20th deadline. The cost to comply with the regulation in this manner will have a significant negative impact on our institution.

I respectfully request that the Board at a minimum consider delaying the effective date of this new regulation until such a time as software vendors and loan documentation vendors can develop plans for institutions to implement. I also respectfully request that the Board reconsider applying this regulation to other open ended loans other than credit cards.

Cliff Murley
Pantex Federal Credit Union