

From: Capitol View Credit Union, Brent Kowalsky
Subject: Reg Z - Truth in Lending

Comments:

I am extremely disappointed that the 21 day rule applies to HELOC loans. We are a \$24 million dollar credit union with approximately 2000 members. Most of our members are employees of the State of Iowa and get paid on a bi-weekly basis. Many of our members request a bi-weekly payment plan on their HELOC. We've been told by our data processor that we will need to change all of our payments to a monthly basis, due around the 28th, because we send statements out monthly, which are mailed around the 1st of the month. We will incur data processing costs, legal costs, and staff costs in order to implement this change. Our members will end up paying for it. We have had no problems with our HELOC program, which we've offered since 1987. It has been reported that this legislation was rushed through Congress with little time for anyone to comment. We do not charge a late charge on HELOC loans. Currently none of our 94 HELOC loans is delinquent. Please strongly consider revising the rules to exempt HELOC loans from the Credit CARD Act.

Brent Kowalsky
Capitol View Credit Union