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Board of Governors of the Federal Reserve
20th& C Streets NW
Washington, DC 20551

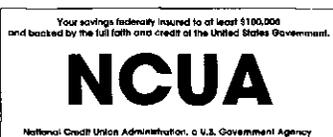
Re: Docket N. R-1364
2009 Card Act

Dear Board of Governors of the Federal Reserve,

I am writing this letter to request a delay in the implementation of the interim rule of the 2009 Card Act. I am the Chief Executive Officer of SPCO Federal Credit Union in Houston, Texas. SPCO FCU is a \$23.5m credit union, chartered in 1936, serving Union Pacific Railroad. We are a "blue-collar" credit union with a limited product offering, serving approximately 6,000 member owners. We currently offer open-end lending to our membership as a convenience and means of meeting their diverse needs. As you might imagine, serving the railroad industry means providing access to members that are often on a train away from home. Open-end lending provides the member an opportunity to meet their loan needs without the inconvenience of physically visiting our office. Oftentimes the member will need access to their open-end loan to receive travel money so that they may either reach their next assignment or return from their previous one. Open-end loan advances are the safety net they rely on.

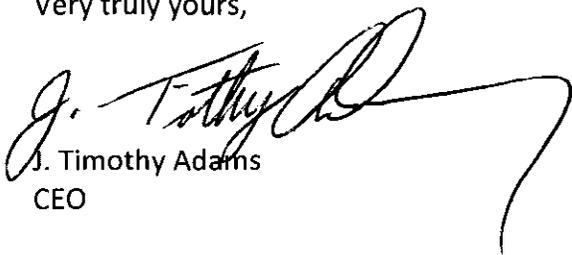
In researching this interim rule and the onerous compliance responsibilities imposed upon banks and credit unions, I am dumbstruck as to how to comply. While this regulatory burden will be difficult for even the largest financial institutions, I believe the impact to small credit unions will be even more challenging. SPCO FCU currently has approximately 1,500 open-end loans with a full-time staff of 7 employees. Our core processing system is neither robust nor flexible enough to respond to such significant change in so little time. As I study this, it appears one of the few options may be to transition from computer based automated processing to manual processing to meet the August 20, 2009 deadline. This will lead to severe service disruptions to the very people this rule was designed to protect. The majority of our open-end loans are paid semi-monthly through the member's payroll deduction. This allows us to provide access to many that banks deem "unbankable" and are "prey" for predatory lenders.

I understand and agree with the changes as they apply to credit cards, but I believe these changes that include all open-end lending do more harm than good. The members of SPCO FCU will be left asking "How a credit union that does not even offer credit cards get lumped in with the bad guys?"



While I agree there are many predatory lenders, this credit union, and the credit union movement are not. Please do not punish the members of SPCO Federal Credit Union for the sins of others by implementing this interim rule on August 20, 2009. At the very least, *please* delay the implementation to a later date to give all financial institutions a reasonable amount of time to comply.

Very truly yours,



J. Timothy Adams
CEO