

August 4, 2009

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

Dear Sirs,

I am the manager of Rocket Federal Credit in McGregor, Texas. Our credit union is a 2600 member credit union serving a rural area and with an asset size of \$16,300,000. We are a small but viable hometown credit union, having served our membership for over 55 years.

I am writing out of concern for our members regarding the recent passage of the Credit Card Act, specifically, language of the act that extends to open-end lending that effects the majority of credit unions. The original intent of this ruling was for the credit card industry. The effects it will have on open-end loans at credit unions was not discussed before passage. The ramifications for credit unions to comply in such a short time was not considered nor was the financial burden it places on our members in scheduling repayment of their loans.

Our current system of open-end lending accommodates our members to pay according to their budgeting needs and payroll schedule. To force our members to change would provide a hindrance to members and reflect negatively upon the credit union movement as a whole.

Credit Unions offer consolidated statements of all the member's deposit and loan accounts. For credit unions to comply with the ruling would force us to totally change and reprogram our processes and timing for statement mailings placing a financial burden for programming and mailing expense. The ruling would place a undue burden on credit unions and force changes on our members that do not provide additional benefit to them.

Credit Unions have not engaged in the predatory lending credit card practices this bill was designed to address. The response from members to the measures we are being asked to take can only have a negative impact on credit unions.

I ask for you first to please delay implementation of the new interim final rule for several months. More time is needed by credit unions, data processors and our members to sort out the complex issues associated with the ruling and get it right before implementation.

Secondly, I ask if you would examine the reasoning behind the inclusion of open-end lending being added to the ruling. Open-end lending was not in the original House version which overwhelmingly passed with support from both parties, it was added later. If after examining the

reasoning, it is my hope that the conclusion be drawn that a legislative reversal may be in order to remedy this situation where open-end lending as credit unions practice now can remain unchanged.

Thank you for allowing me to voice my concerns.

Sincerely,

Glenda Hollingsworth  
Manager, Rocket FCU  
P.O. Box 235  
McGregor, Texas 76657