

From: Oregon Community Credit Union, Rosie Pryor  
Subject: Reg Z - Truth in Lending

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Comments:

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Proposal: Regulation Z - Truth in Lending  
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Comments:

Thank you for the opportunity to comment. This regulation was adopted too swiftly. The technical issues related to implementation are immense and the timeline for implementation is unrealistic. The rule is counter intuitive. Instead of benefiting credit union members, it will have the effect of negatively impacting members who have chosen loan payment due dates that are a function of timing and frequency of their payroll dates, etc. Carefully constructed family budgets depend upon being able to make payments when income is received. Arbitrarily requiring a single, uniform payment date eliminates our ability to meet our members' needs. Please consider revising the rule to apply only to credit cards; not to open-ended credit union loans.

Thank you.  
R. Pryor