



August 12, 2009

TO: Federal Reserve System

Reference: Regulation Z; Docket No. R-1364

Dear Sir,

We are Educational Community Credit Union, a small credit union serving educator, administrators, and maintenance school personnel in Southwest Missouri. As such we serve members who are spread out over a 24 county area. Many years ago we adopted CUNA's open-end lending system in order to cut-down on time necessary to close a loan outside of Springfield, Missouri or eliminate repetitive applications and paperwork required to grant a closed-end note.

I was notified by (CUNA Regulatory Comment Call) email that regulation Z "will require creditors to adopt reasonable policies and procedures to ensure that periodic statements for any open-end consumer credit account are mailed or delivered at least 21 days before the payment is due in order to be able to charge a late fee or to otherwise consider the payment late".

Approximately 85% to 90% of our loans are "open-ended" and therefore would require a monthly periodic statement. Currently we produce and mail a VISA statement monthly (contains a 25 day grace period) and an open-end loan statement quarterly. Therefore, we are in compliance with the 21 day rule on credit cards. However, the other open-end member loan payments are due on various or all calendar days each month. That would require us to produce and mail statements daily rather than quarterly. That is not possible under the current computer system and we have just invested \$96,000 in June on HW/SW upgrades to be loaded in November, 2009.

More cost equals higher interest rate on loans and/or less dividends to our members (consumers) savings. Please remove the provisions that apply to open-end credit. We, nor our processor have the 21 day periodic statement capability and have no date for implementation. Also our members will not understand the extra paper and postage expense relative to these mailing when they have a loan payment coupon book in hand with which to follow when each payment is due.

Sincerely,


Steve Wansing
ECCU President