

From: WEOKIE Credit Union, Brent Taylor
Subject: Reg Z - Truth in Lending

Comments:

Thank you for accepting the following comments and requests related to the Credit Card Accountability, Responsibility and Disclosure Act of 2009 (CARD Act). The provision causing the greatest concern requires creditors to provide periodic statements for open-end consumer credit accounts at least 21 days before the payment due date or the creditor cannot consider the payment late for any purpose.

For decades, WEOKIE Credit Union (\$742 million, Oklahoma City, Oklahoma) has utilized open-end lending programs for consumer loans, such as vehicle loans, to provide convenience for its borrowers. Borrowers have the option to apply for "add-on" loans, extensions, or term revisions without the necessity of creating "new" loans with each request. Members understand, are fully aware, and are comfortable with their monthly payment due dates. It is unreasonable to believe any borrower does not recognize they have a monthly auto loan payment and understand, for instance, that it is due the first of every month. We know of no complaints from borrowers related to their payment due dates and/or their knowledge of such payments.

To comply with the "21 Day Notice" requirement will force the credit union to confuse its borrowers by changing due dates. Maybe the borrower does not want their due date changed? Maybe they have established auto-withdrawal or payment practices that will not work well with an arbitrarily adjusted due date?

Even worse to imagine is that the credit union would undertake all of the costly measures and create all of the confusion with its borrowers, only to have Congress eliminate or revise the laws in a short period of time, again creating more confusion. (We understand significant efforts are underway at the Congressional level to rectify the potential issues.)

We respectfully request the Federal Reserve:

- 1) Issue a statement noting that it reasonably appears that it may not have been the intent of the CARD Act's "21 Day Notice" provisions to create turmoil and confusion among borrowers (consumers) related to their open-end loan payment due dates, with little to no underlying benefit for borrowers, therefore, the Federal Reserve will not issue regulations or enforce the provisions until Congress has an opportunity to clarify its intent.
- 2) At a minimum, significantly delay implementation of the "21 Day Notice" provisions to allow financial institutions an opportunity to properly adjust software systems, communications, etc. to more effectively manage the potential turmoil borrowers will experience.

Thank you.

Brent Taylor
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