

From: Niagara Countys Federal Credit Union, Nancy Kasprzak-Whitmore  
Subject: Reg Z - Truth in Lending

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Comments:

Dear Sirs,

As a small credit union (under \$40 million in assets) operating 3 buildings with a total staff of 20 people, these regulation changes will be almost impossible for us to implement in the short amount of time we've been given to do so. We serve over 9,500 members in Niagara County, NY by offering them the financial services they've requested. One of those services was the ability to choose their loan payment due date within the month to coincide with their family's unique financial situation. This regulation mandates that we either send out statements almost daily (which we cannot afford to do) or that we amend the majority of our existing open-end loans to change the payment due dates to comply with the lead-time for statements.

Please consider giving us some breathing room on the time allowed to make these required changes! Thank you for your consideration.

Nancy Kasprzak-Whitmore  
Niagara County's Federal Credit Union