

From: Cooperative Extension Service Federal Credit Union, Kim Wiedower
Subject: Reg Z - Truth in Lending

Comments:

I would like to comment on the Card Act Provisions.

I am the Manager of the Cooperative Extension Service Federal Credit Union in Little Rock, AR. We have 4.4 million in assets, which is a small credit union in credit union land.

We make open-end loans in which members can apply for advances to be added to their current loans. Each advance has to be approved by our credit committee or loan officers, which means that each advance is not guaranteed. Most of our members are on payroll deduction and are paid semi-monthly so their loans are set up for semi-monthly payments.

In order to comply with the 21 day notice of payment rule, we would have to change all of our loans to monthly payments and change from quarterly to monthly statements. That also means we would be mailing out 8 months of additional statements which would cost us in excess of \$2,000.00 more per year. For small credit unions, this would be cost prohibitive. This would also be very confusing to our members to have their due dates changed to a different date on their loans.

We don't charge late fees on open-end loans to our members and we give our members good interest rates on their loans. I feel that credit unions under a certain asset size (small credit unions) should be exempt from this regulation to prevent undue hardship.

Kim Wiedower
Cooperative Extension Service
Federal Credit Union