



Bert J. Hash Jr.
President & CEO
7 East Redwood Street
Baltimore, MD 21202

2009 AUG 18 AM 9:03
COMMUNICATIONS

August 11, 2009

Board of Governors of the Federal Reserve Board
Attn: The Honorable Ben S. Bernanke, Chairman
20th and C Streets, NW
Washington, DC 20551

Re: Credit Card Accountability Responsibility and Disclosure Act
Docket No. R-1364

Greetings Chairman Bernanke:

Presently we, Municipal Employees Credit Union of Baltimore, Inc. (MECU), serve over 93,800 members. With locations within the Baltimore Metropolitan Area and surrounding perimeter, we provide a myriad of products and services that benefit our members. Many of them request loan repayment via convenience methods, i.e. automatic deductions, internal share transfers, etc. and opt not to receive paper statements. Given this and the associated complications in compliance within such a condensed period of time, I respectfully submit this letter to you and the full Board of Governors requesting a delay in the 21 day compliance notice provisions for open end credit plans with the exception of the credit cards due to take effect on August 20, 2009.

The challenges that our credit union faces in complying with this 21 day provision for all open end plans is immeasurable. Our open end plan is inclusive of unsecured lines of credit, personal loans, vehicle loans, home equity lines of credit and associated checking accounts. The ability for us to meet this stringent time requirement given current resources appears to be improbable. The results will be the inability to accurately report those who are truly late and assess the pertinent late charges. In addition, the following challenges and constraints exist:

- Operational impact in the extension of due dates and associated member impact
- Member confusion over monthly due dates with bi-weekly payment contracts
- "Short period of time" clarification
- Cost association and impact to cash flow
- Staff training for assurance of full understanding
- Service impact

MECU
August 11, 2009
Page 2

I ask that you re-evaluate the full impact of this 21 day provision on open-end plans with the exception of the credit cards slated to take effect on August 20, 2009. I implore you to consider a delay in compliance and appreciate you taking the time to assess my concerns.

Sincerely,

A handwritten signature in black ink that reads "Bert J. Hash Jr." with a stylized flourish at the end.

Bert J. Hash Jr.
President/CEO