

**BRAZOS HIGHER EDUCATION SERVICE CORPORATION, INC.**

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June 1, 2009

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Ms. Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal Reserve System

Via E-mail: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

Ref: Docket No. R-1353

Dear Ms. Johnson:

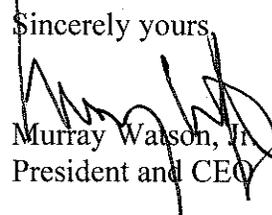
We appreciate the effort that you have made to advise us on the Board's proposal to implement new regulations under the Higher Education Opportunity Act (HEOA).

We are in the private education loan business in a very limited way and currently comply with the disclosure and rule requirements for private education loans. We think it would be a mistake to broaden the definition for private education lending to include loans that some portion of which proceeds might be used for education purposes but the balance is for other expenses.

Therefore, we request that the phrase "in whole or in part": be removed from the regulations definitions so that these multipurpose loans may be excluded from the coverage for all new requirements for private education loans.

Thank you for your consideration. With best regards, I am

Sincerely yours,

  
Murray Watson, Jr.  
President and CEO

MW/pt