

From: University of Texas at El Paso, Raul Lerma
Subject: Reg Z - Truth In Lending

Comments:

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, DC 20551

Dear Ms. Johnson,

I would like to express my concern that short term loans for tuition/fees, books, and from what I understand even installment plans, are being classified as private education loans. These are programs offered to assist our students through short term financial assistance to allow them to continue their education. In many cases, this is temporary until their financial aid is applied. Any delays would affect our students, many of who are first generation, from enrolling, or meeting payment deadlines due to the proposed disclosure requirements and mandatory waiting periods for release of funds. Please reconsider such programs being considered private education loans since the definition of private loans has always implied being long term loans. I hope you will consider exempting such institutional programs from the requirements described in the proposed rules. Our students face a number of challenges the biggest one being the fear of being able to pay to continue their education. We need to provide our students every possible financial opportunity to address this concern. If you should have any questions, please feel free to contact me.

Sincerely,

Raul H. Lerma, Director
University of Texas at El Paso