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December 23, 2010

Via Email: regs.comments@federalreserve.gov

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

Attention: Docket No. R-1393 and RIN No. 7100-AD55

Re: Comments on Regulation Z Proposed Rule

Dear Ms. Johnson:

This letter is submitted to the Board of Governors of the Federal Reserve System in response to the proposed rule published in the *Federal Register* on November 2, 2010 at 75 *Fed. Reg.* 67458-67509 relating to open-end (not home-secured) credit plans, in order to implement provisions of the Credit Card Accountability Responsibility and Disclosure Act of 2009 and the corresponding Official Staff Commentary.

I agree with and concur with the comments made by the NBPCA in its email correspondence dated December 23, 2010.

Sincerely,



Sarah Fagin Cutrona
General Counsel
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