

**Contact Between Federal Reserve Staff
and Representative of J.P. Morgan Chase
January 19, 2011**

Participants: Benjamin K. Olson and Stephen Shin (Federal Reserve Board)

Meg Zaleski, Vice President & Assistant General Counsel (J.P. Morgan Chase)

Summary: Staff of the Federal Reserve Board (“Federal Reserve”) responded to a telephone inquiry from Meg Zaleski of J.P. Morgan Chase (“Chase”) regarding the Board’s proposed rules implementing Section 1100E of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”). Effective July 21, 2011, the Dodd-Frank Act amends the Truth in Lending Act (“TILA”) and the Consumer Leasing Act (“CLA”) by increasing the thresholds for exempt consumer credit transactions and exempt consumer leases from \$25,000 to \$50,000. The Dodd-Frank Act also provides for annual increases in the thresholds based on increases in the Consumer Price Index.

The discussion focused on the Federal Reserve’s proposed application of the increased TILA exemption threshold to certain consumer credit accounts opened prior to July 21, 2011. In particular, Chase expressed concern about requiring an account that qualified for an exemption at account opening under the \$25,000 threshold to begin complying with TILA after July 21, 2011 if the account does not qualify for an exemption under the \$50,000 threshold.