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Comments:

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We are writing to provide input to the rules that are part of the CARD Act, specifically the part of the new Reg Z rules that requires credit card companies to provide the consumer with a list of three credit counseling agency telephone numbers each month on their statement. Requiring card issuers to provide a toll free number to certified non-profit credit counselors will be good for consumers. Our concern only revolves around the way that the three toll free numbers are selected by card issuers. We strongly believe that to adhere to the intent of the law, consumers need to be given at least one choice for electing a non-profit credit counseling organization that serves their LOCAL area and not be mandated to calling only nationwide call center type operations. Some consumers will be best served when they have the option of connecting to a local non-profit credit counseling agency that can provide a full spectrum of credit, debt & budget advice along with a thorough knowledge of local resources & opportunities for the consumer. We believe that the regulation should require that one of the three required options for credit counseling contact be a resource giving them access LOCAL provider. There is already precedence of this type of requirement in a current HUD requirement that Reverse Mortgage (HECM) counseling clients receive at least one local referral for counseling to protect consumers from the possibility that lenders and providers could create relationships that would be more beneficial to the lender than the consumer. We believe this risk exposes itself in the new Reg Z area if lenders have too much opportunity to select only a certain type of credit counseling entity to refer its customers to. This simple requirement (for local credit counseling contact information) can be implemented easily and without additional expense by using a counselor locator service such as the one provided by the National Foundation for Credit Counseling who has member agencies in all 50 states. We believe the intent of this portion of the CARD act was to give consumers more options to solve financial problems before they reach the crisis stage of delinquency and the option of local credit

counseling can only increase the odds that clients will have many options available to them to solve their financial problems.