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Subject: Regulation Z - Truth in Lending (Credit Card Act)

Comments:

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RE: Regulation Z; Docket No. R-1370 To Whom It May Concern: The Federal Reserve's current proposed rules regarding the CARD Act is going to provide consumers with a number of positive changes. Among these changes, credit card issuers will be required to provide more advanced notice on interest rate increases and/or any significant changes in terms, more education regarding their outstanding balances, and providing the cardholder with information on how to go about getting counseling from nonprofit credit counseling and debt management services. Although the information on how to get assistance from a nonprofit credit counseling service is greatly needed, the proposed rule needs to go one step further with what information card issuers are providing to consumers. Currently stating, "a card issuer must provide through the toll-free telephone number disclosed pursuant to proposed §226.7(b)(12)(i)(E) or (ii)(E) the name, street address, telephone number, and Web site address for at least three organizations that have been approved by the United States Trustee or a bankruptcy administrator pursuant to 11 U.S.C 11(a)(1) to provide credit counseling services in the State in which the billing address for the account is located or the State specified by the consumer." In today's economy, many consumers facing financial difficulties are making the choice to seek advice and guidance from local nonprofit credit counseling agencies. By not fully disclosing to consumers that they have access local comprehensive credit counseling agencies, consumers will fail to benefit from any additional community resources that they may qualify for based on their particular circumstances which could help improve their financial state that much more. The U.S. Department of Housing and Urban Development (HUD) requires seniors, wishing to take a Home Equity Conversion Mortgage (HECM), to participate in an information session given by an approved HECM counselor. HUD provides a roster of agencies permitted to provide this comprehensive housing counseling located

throughout the country. HUD provides the necessary information these homeowners need in addition to allowing seniors to choose for themselves the agency, location and manner in which their counseling session is done without having the reverse mortgage lender influence their decision. These approved housing counseling agencies can be accessed via HUD's website or toll-free phone number. The National Foundation for Credit Counseling (NFCC) is the nation's largest and longest serving national nonprofit credit counseling network, with more than 100 Member agencies and nearly 850 offices in communities throughout the country. Equivalent to HUD, the NFCC also provides a counseling locator service which provides contact information for these nonprofit Credit Counseling agencies located throughout the country through a toll-free phone number or via their website ([www . NFCC.org](http://www.NFCC.org)). Adding the counseling locator service option in the proposed rules would greatly improve the options available to consumers. Consumers facing financial difficulty are in a very stressful and panicked state of mind. This panic can lead to paralysis by taking no action to improve their financial situation; or even worse, making poor choices due to rushed decisions further harming their financial position. As a result, these individuals need as much information and options provided to them as possible to help guide them in the right direction to stabilize their financial situation.