

April 13, 2011

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

**Re: Docket No. R-1407
RIN 7100-AD66**

VIA ELECTRONIC MAIL: regs.comments@federalreserve.gov

Dear Ms. Johnson,

The Michigan Credit Union League (MCUL) appreciates the opportunity to comment on the Federal Reserve Board's (the Board) proposed amendments to the risk-based pricing and account review notices required under the Fair and Accurate Credit Transactions Act of 2003 (FACT Act). MCUL is a statewide trade association representing 95% of the credit unions located in Michigan.

MCUL understands that the proposed changes to the content of the risk-based pricing model forms are required by the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), and the opportunity for change is unlikely. However, it is important to note that these changes, while seemingly small compared to major regulatory updates, represent additional time and expense to implement including among other things, time and expense for training and related software updates. These incremental changes have continued to build and aggregate into compliance mandates that are diverting important resources for all institutions, and strangling smaller institutions!

As for this particular proposal, in light of the "general risk-based pricing rules" that became effective January 1, 2011, MCUL is at a loss as to why the Board did not take appropriate action to delay the effective date of those rules to incorporate the changes in this proposal as mandated by Dodd-Frank Act, which was signed mid-year, July 21, 2010. What has resulted is that credit unions and other financial depositories have spent the time and financial resources to implement the earlier rules only to have to go through the same exercise mere months later.

As for the need for additional content, MCUL does not support including any additional content in the risk-based pricing and account review notices than what has been mandated by the Dodd-Frank Act. Weighing down existing disclosures with ever increasing information in order to better inform consumers does not ensure that the consumer will read the disclosures that financial institutions are continually required to provide.

MCUL strongly urges the Board to consider the real-world impact that all of these regulatory changes have on financial institutions. It is MCUL's sincere hope that the Board will ensure that,

Jennifer Johnson
Board of Governors of the Federal Reserve System
April 14, 2011
Page 2

in the future, related regulatory changes will be more in sync with legislative changes in order to provide less disruptive and less expensive transitions for the regulated institutions.

MCUL appreciates the opportunity to provide comment on this proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. DeFors", written over a light gray rectangular background.

Michael J. DeFors
VP Regulatory Affairs
MCUL & Affiliates