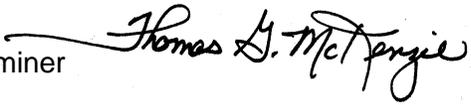


Informational Memorandum



January 11, 2010

To: Chief Executive Officer
All Farm Credit System Institutions

From: Thomas G. McKenzie, Director and Chief Examiner
Office of Examination 

Subject: Truth in Lending Act Amendments – Credit CARD Technical Corrections Act of 2009

In an Informational Memorandum (IM) dated September 16, 2009, the Farm Credit Administration (FCA) advised that the Federal Reserve Board (FRB) had recently approved an interim final rule amending Regulation Z (12 CFR Part 226), which implements the Truth in Lending Act (TILA). This interim final rule implemented provisions of the Credit Card Accountability Responsibility and Disclosure Act of 2009 (Credit CARD Act). As FCA explained, most of the interim final rule's provisions pertained only to consumer credit card accounts, but one provision – a requirement that creditors must mail or deliver periodic statements at least 21 days before the payment is due – applied to all open-end consumer credit accounts.

On November 6, 2009, President Obama signed the Credit CARD Technical Corrections Act of 2009, which amends section 163(a) of the TILA to narrow the scope of application of the Credit CARD Act's 21-day periodic statement requirement. Effective immediately, the law requiring the periodic statements (like the rest of the rule) applies only to consumer credit card accounts. FCA anticipates that the FRB will revise section 226.5(b)(2) of Regulation Z to conform the regulation to the statutory change.

If you have any questions about this Informational Memorandum, please contact Jennifer A. Cohn, Senior Counsel, Office of the General Counsel, at (703) 883-4020, or by e-mail at cohnj@fca.gov; and/or David Stephens, Office of Examination, at (703) 883-4412, or by e-mail at stephensd@fca.gov.