



*Serving Credit Unions in California and Nevada*



July 7, 2005

Mary Rupp, Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

Re: Comments on Interim Final Rule Part 717, Fair Credit Reporting – Medical Information

Dear Ms. Rupp:

The California and Nevada Credit Union Leagues are pleased to comment on the National Credit Union Administration (NCUA) Board's Interim Final Rules on Disclosing and Using Consumer' Medical Information. Together, the California and Nevada Credit Union Leagues represent the largest state trade association for credit unions in the United States, serving 500 member credit unions in California and Nevada with 8.8 million members.

The California and Nevada Credit Union Leagues strongly support the interim final rules which will create exceptions to the general prohibition against obtaining or using medical information in connection with credit eligibility determinations.

Before the enactment of the FACT Act, medical information could be used to evaluate consumers seeking financial services. Conversely, a complete prohibition against using medical information could effectively bar production of critical information that might assist consumers by providing a more complete picture necessary to produce a positive result. The Leagues believe that the exceptions in the interim final rules provide an appropriate balance between proper and improper use of medical information and will ultimately benefit consumers.

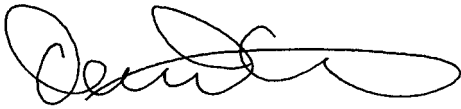
The Leagues applaud the Federal Reserve Board's separate, but nearly identical interim final rules that apply these exceptions to state-chartered credit unions and others in the financial services industry that were not covered under the original proposed interagency rules. This measure was absolutely necessary to prevent state-chartered credit unions

from being at a significant competitive disadvantage to federal credit unions, who were initially the sole beneficiary of the exceptions within the credit union sphere. Now, all credit union and their members will benefit from the exceptions included in the interim final rules.

In closing, the California and Nevada Credit Union Leagues applaud the NCUA's continuing efforts to facilitate positive relationships between credit unions and their members through pro-consumer rulemaking.

Thank you for the opportunity to express our views on the interim final rules.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Chatfield". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

David L. Chatfield  
President/CEO  
California and Nevada Credit Union Leagues