December 9, 2005

Ms. Mary Rupp Secretary of the Board NCUA 1775 Duke Street Alexandria, VA 22314-3428

DEC12'05 AM 7:24 BOARD

REF: Comments Part 707 Truth in Savings

Dear Madam Secretary:

Fascinated by the "Alice-in-Wonderland" thinking which proclaims "courtesy overdraft" and "bounced-check protection" advances are not loans. The serpentine semantics and contorted logic of the Federal Reserve opinion are most unconvincingly pretzelian!

A consumer sham, a regulatory mockery of the first order.

Question: Who do we think we're fooling?

Answer: No one; not even ourselves...

Never has "Truth in Savings" been less so.

Sincerely,

James C. Blaine

President

JCB/ji

