



NATIONAL CREDIT UNION ADMINISTRATION
Washington, D.C. 20456

February 12, 1988

GC/TPM:sg
3500

Office of General Counsel

Mr. Ed Muehlenberg
Vice President-Legislation
Wisconsin Credit Union League
10025 W. Greenfield Avenue
West Allis, Wisconsin 53214

Re: Cosigner Notice (Your January 4, 1988, Letter)

Dear Mr. Muehlenberg:

To lay to rest any ambiguity, this is our understanding of where we now stand on the extent to which Federal credit unions in Wisconsin are exempt from compliance with our Credit Practices Rule under Section 706.5(b) [12 C.F.R. §706.5(b)]:

1) Consumer credit transactions under \$25,000 that are subject to the Wisconsin Consumer Act and its implementing regulations are exempt from compliance with NCUA's Credit Practices Rule [12 C.F.R. §§706.1-706.5].

2) Though compliance with the relevant provisions of the Wisconsin Consumer Act for consumer credit transactions of \$25,000 and over would probably constitute compliance with NCUA's rule (as the Federal Reserve Board has apparently agreed with respect to its Credit Practices Rule), the State of Wisconsin has not requested this additional exemption from the Federal Trade Commission or NCUA.

Sincerely,

TIMOTHY P. MCCOLLUM
Assistant General Counsel

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