



NEW ENGLAND FINANCIAL SERVICES ASSOCIATION

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October 30, 2000

Mr. Thomas J. Curry
Commissioner of Banks
Commonwealth of Massachusetts
Division of Banks
One South Station
Boston, MA 02110

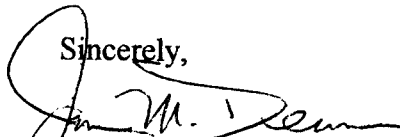
**Re: 209 CMR 32.00: Disclosure of Consumer Credit Costs and Terms
209 CMR 42.00: The Licensing of Mortgage Lenders and Mortgage Brokers
209 CMR 40.00: Unfair and Deceptive Practices in Consumer Transactions**

Dear Commissioner Curry:

I realize the comment period for the above listed proposed regulation has closed and that this letter will not be part of the official record of comment, but I wanted to propose one new suggestion to assist everyone once the final regulation is adopted. Because the new regulation may require system changes and the printing of new documents, the New England Financial Services Association requests the effective date following adoption take these items into consideration. We suggest the new regulation take effect 90 days following adoption.

Thank you in advance for considering this suggestion.

Sincerely,



James M. Demers
President