



Compliance Corner

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It's been a wild couple of years for all aspects of banking, including credit cards. CAPITAL Card Services can help guide you through confusing federal regulations and rule changes.

Regulation Z has 28 unique requirements for credit cards, and the Fair and Accurate Credit Transactions Act (FACTA) has 15 requirements.

Other rules include:

- Response programs for unauthorized access to consumer data
- Dual-factor authentication for Internet access
- Unlawful Internet Gambling Act
- NACHA rule changes
- Reasonable amortization of balances
- Fraud and risk evolution
- Americans with Disabilities Act expectations
- Debt collection evolution, including state laws
- Debt restructuring rules and reporting (ie: credit counseling accounts)
- Pandemic planning
- Telephone Consumer Protection Act
- Postal changes
- Payment Card Industry (PCI)
- Data protection requirements
- Legal developments and precedents and accounting rules, including allowance expectations and FAS 5 reserves.

In the near-term, FACTA risk-based pricing notices and new privacy notices are due by Jan. 1, 2011, and there is a new Bank Secrecy Act handbook. Also, the Regulatory Reform bill (HR 4173) is estimated to place 30 new rules on banks and generate 5,000 pages of new regulations.

We have guided our clients through each of these rule changes cleanly, precisely and in advance of each due date. In addition, because we have more than 25 years of experience in understanding the card market, we not only manage the "rules" but also the implications of the changes as they relate to managing a card portfolio. We help you make the best decisions with the least impact--driving favorable examination results and giving you confidence to build your program into a profitable venture.