

Opinion 96-10 (Redacted version)

August 26, 1996

“A”

Subject: **“B Credit Union”** proposed TravelAccount and Rebate Option Programs-Opinion no. 96-10

Dear:

This letter is in response to your letter dated July 12, 1996, on behalf of your client, **“B Credit Union”**. Your letter requested our opinion on the applicability of WAC 208-440-020, -030, and -050 to the proposed TravelAccount and Rebate Option Programs (collectively, “Programs”) that **“B Credit Union”** intends to offer to its members. My conclusions are as follows.

Inapplicability of WAC 208-440-030 (“Section -030”)

On August 20, 1996, the Department adopted a final rule repealing Section -030. A copy of the filing is enclosed. The repeal takes effect on September 20, 1996. Although it is unclear from your letter when the Programs were intended to be implemented by **“B Credit Union”**, I would not consider Section -030 applicable to the Programs if they were implemented after August 20, 1996.

No action to assert violation of WAC 208-440-020, -050 (“Sections -020 and -050”)

Based on the facts and reasoning presented in your letter, and other considerations, I have determined not to take any action against **“B Credit Union”** to assert a violation of Sections -020 and -050 for offering the Programs in accordance with your letter. Please be aware that a change in the facts as presented in your letter may require a different conclusion.

If you have any further questions about these matters, please contact me at (360) 902-8778.

Sincerely,

J. Parker Cann
Assistant Director