

## WICKLINE FINANCIAL INSURANCE

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November 17, 2010

Chairman Ben S. Bernanke  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue NW  
Washington, DC 20551

Mr. Chairman:

I write in opposition to the Federal Reserve's proposed changes to Reg Z relating to credit insurance and debt protection disclosures.

The proposed disclosures contain false and misleading statements regarding credit protection products. The proposed new disclosure applying to GAP is one example of the Federal Reserve's ill-advised and inaccurate assumptions.

Wickline Insurance is in a unique position because we market GAP through many financial institutions. We also offer a "GAP endorsement" to customers purchasing automobile insurance policies through our agencies. **HOWEVER, WE RARELY SELL A GAP ENDORSEMENT ON AN AUTOMOBILE INSURANCE POLICY.** There are two reasons:

1. Many automobiles do not qualify for a "GAP endorsement" - especially if the customer is buying a used vehicle.
2. The "GAP endorsement" offered by most automobile insurance companies provides a lesser benefit than the GAP product a customer can purchase from their lender.

**In fact, if an automobile insurance customer contacts our office about GAP, we often refer them back to their lender!**

Please see the attached proposed disclosure, which would apply to GAP. How can the Federal Reserve Board justify language such as *“Other types of insurance can give you similar benefits and are often less expensive”* or *“If you already have insurance... you may not need this product”*?

This language in this disclosure cannot be justified because it IS NOT based upon fact. The Federal Reserve Board has a duty to its members, and to the general public, to fully understand the facts of any issue before creating new regulations.

Cordially,

A handwritten signature in black ink, appearing to read 'Larry Wickline', written in a cursive style.

Larry Wickline

Enclosure

**H-17(A) Credit Insurance, Debt Cancellation Coverage,  
or Debt Suspension Coverage Model Form**

**OPTIONAL COSTS**

**Option to Purchase (*Name of Product*)**

**STOP.** You do **not** have to buy (*name of product*) to get this loan. Go to (*Web site of the Federal Reserve Board*) to learn more about this product.

<b>Do I need this product?</b>	[These payments will only temporarily suspend your payments due and will not reduce the balance you owe. Your balance will actually increase during the suspension period as interest continues to accumulate.]  If you already have enough insurance or savings to [pay off this loan][make payments on this loan] if you ( <i>covered event</i> ), you may not need this product.  Other types of insurance can give you similar benefits and are often less expensive.
<b>How much does it cost?</b>	This product will cost up to ( <b><i>maximum premium or charge</i></b> ) per ( <b><i>period</i></b> ). [The cost depends on your [loan balance][interest rate].]
<b>What is the maximum benefit amount?</b>	This product [will pay off your outstanding loan balance, which is now ( <i>outstanding loan balance</i> )] [only covers the first ( <i>maximum benefit amount</i> ) of the outstanding balance on your loan] [will make your loan payments of up to ( <i>amount</i> ) for ( <i>period</i> )]. [You will be responsible for any balance due above ( <i>maximum benefit amount</i> ).]
<b>Can I receive benefits?</b>	<b><u>You may not receive any benefits even if you buy this product.</u></b>  You meet the [age][employment] eligibility requirements [but there are other requirements that you must meet. If you do not meet these requirements, you will not receive any benefits even if you buy this product and pay the ( <i>period</i> ) [premium][charge]].
<b>How long does the coverage last?</b>	This product provides coverage for the first ( <i>period</i> ) of your loan [or until you reach age ( <i>age</i> ), whichever comes first].

Yes, I want to purchase optional (*name of product*) at a cost of up to (*maximum premium or charge*) per (*period*).

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Signature