

From: Security One FCU, Pamela Stephens
Subject: Regulation Z - Truth in Lending

Comments:

December 21, 2010

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Sent Via Email to: regs.comments@federalreserve.gov

Re: Proposed Changes to Credit Insurance Disclosures under Regulation Z
and the Truth-in-Lending Act

Docket No. R-1390

Dear Board of Governors:

I am writing on behalf of the interests of the 9,300 members of Security One FCU in Arlington, Texas. My credit union is very concerned with the recent proposal to mandate specific disclosures for payment protection products, including credit life, credit disability, and debt cancellation and debt suspension coverage. We feel the disclosures unfairly portray the products we offer.

Over the years credit life and disability coverage has proven to be a godsend to many of our members who are employed at the GM Assembly Plant in Arlington, Texas. One recent case is that of a couple who were involved in a car accident in which the husband was killed. During 2009, they elected credit life on both auto loans they had with us. One of the vehicles was totaled in the accident and the auto insurance company paid that loan. We assisted the family with filing a claim on the other vehicle and the remaining balance was paid in full. Had they not chosen credit life, the widow would have responsible for the balance.

Over the years we have witnessed the gratitude of survivors and members who have experienced disabling injuries on the job. Many had no other coverage and would have been unable to continue payments.

Please change the proposed disclosures to include accurate, fair, and objective information.

Pamela Stephens
President/CEO
Security One FCU