

From: Securian Financial Group/Minnesota Life Insurance Company, Catherine Klimek
Subject: Regulation Z - Truth in Lending (Credit Card Act)

Comments:

Dear Federal Reserve Board:

We would like to submit one additional comment to our Comment Letter which we submitted on November 16, 2009.

On proposed Model Form G-20, "Change-in-Terms Sample (Increase in Annual Percentage Rate)", the second sentence states that the consumer has the right to opt out of the changes. However, the Board is proposing that no such right be given, since increases in APRs cannot apply to existing balances. We agree with the Board that providing the right to opt-out would be redundant and unnecessary. As such, we would like to see the second sentence on the Model Form deleted.

Thank you

Cathy Klimek
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