



Baraboo Municipal Employees Credit Union

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November 22, 2010

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

Re: Proposed Changes to Credit Insurance Disclosures under Regulation Z and the
Truth-in-Lending Act
Docket No. R-1390

Dear Ms. Johnson:

I am writing on behalf of Baraboo Municipal Employees Credit Union to oppose the proposed changes to the credit insurance and debt protection disclosures under Regulation Z. We believe this new rule, will have a negative impact on our members, our credit union.

We believe the proposed changes misrepresent the purpose and value of payment protection products to our members. At this time we are in fear that our members will be discouraged from purchasing credit insurance, thus putting their financial future at risk as well as ours.

One of the specific disclosure changes that we object to include: That our members may not receive any benefits even if you buy this product.

Only 18 consumers participated during two rounds of testing the proposed disclosure changes. This would be like me only polling my 600+ members and doing only what 1 person wants. This is an insufficient sample size to validate such important changes.

We believe that the proposed credit insurance disclosures will not only hurt The Baraboo Municipal Employees Credit Union's ability to generate much needed non-interest income. But also, lead to an increase in loan losses and charge-offs if consumers are made to feel credit insurance is an unwise investment due to misleading and inaccurate disclosure language. Ultimately, this will lead to less available consumer credit.

Sincerely,

A handwritten signature in cursive script that reads "Judith E. Reppen".

Judith E. Reppen
Pres-Manager
608-356-3441
bmecu@centurytel.net