



FEDERAL CREDIT UNION  
1601 Cedar Street  
Millville, NJ 08332

December 9, 2010

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> 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 in opposition to the proposed amendments to the credit insurance and debt protection disclosures under Regulation Z on behalf of Thunderbolt Area Federal Credit Union, a 15 million dollar in assets.

We believe that the proposed amendments will discourage our members from taking advantage of this extremely valuable insurance:

Thunderbolt Area Federal Credit Union has been offering payment protection products for more than 30 years. Here is an example of how people have benefited from this coverage. This is typical of how it has helped.

We had a member in his thirties, who purchased a new car. He took both disability and life insurance through the credit union on a \$30,000.00 loan. About 8 months into the loan he was rear ended on route 55 in New Jersey. He suffered immensely in the hospital for many weeks before he died. His disability covered the time he was disabled and his life insurance paid off the loan at his death. When I contacted his wife personally she was initially upset that even with his personal insurance and his life insurance from his employment she had no idea how to pay off the loan. When I told her he had the forethought to take the insurances and that the loan was fully paid and there was no impact on the estate, she was relieved and she and her three young children were in a much better state and to see her face when she realized this is something I will never forget.

When it comes to the language you use in the disclosure I would call your attention to the purpose of insurance. One hopes they never have to use it and the benefit is peace of mind, you do not consider this a benefit? We do.

Let's look at Social security. I know someone who paid into social security for 40 years and died and did not collect a penny (other than the \$250.00) death benefit. Based on your disclosure maybe we should have to disclose that social security should not be purchased as you may never use it. A sad commentary from the designers of this proposed amendment.

Thunderbolt Area Federal Credit Union has always supported fair and accurate disclosures to members who purchase payment protection products. Please revise the proposed amendments in order to provide the consumer with more accurate and balanced information about payment protection products.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Millard". The signature is fluid and cursive, with a large loop at the end.

Robert A. Millard  
President/CEO  
Thunderbolt Area Federal Credit Union  
[bob.millard@tbafcu.com](mailto:bob.millard@tbafcu.com)  
856-327-5755 X100