

From: Becky DeVries
Subject: Regulation Z - Truth in Lending

Comments:

Becky DeVries

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Dear Federal Reserve Board:

While our Credit Union has 10% of it's loan balances protected with credit life and disability it has been our desire to offer additional debt protection programs and to increase our protected loans to 25%. We have had many a member who did not sign up for either credit insurance products and they so wish they had. Of our borrowers over 60% do not have the financial means to protect their family or the credit union in the event of a disability or death.

Others believe they have enough protection of disability and life insurance through their employer.

All the burden you are adding with all the changes of disclosures is truly costing consumers more money. You will force small financial institutions to merge into larger institutions creating more of those "to large to fail" financial institutions in the US.

While I agree there have been many a financial institution, board, management, employees using deceptive practices to earn a buck shouldn't there be a less burdensome way to protect consumers from people of no INTEGRITY/MORALES/ETHIC's?

My credit union is very concerned with the Federal Reserve Board's recent proposal that will mandate specific disclosures for payment protection products, including credit life, credit disability, and debt cancellation and debt suspension coverage.

These types of products help credit union members make loans and other types of payments in times of need. This provides members with peace of mind, especially for those members who do not have, and may not qualify for, other types of insurance. These products also help protect members' credit ratings, which is invaluable in ensuring that they have continued access to credit at reasonable rates.

Credit unions have always supported fair, accurate, and appropriate disclosures for members who purchase credit insurance and debt cancellation and suspension products. However, these proposed disclosures misrepresent the purpose and value of payment protection products to credit union members.

These proposed disclosures will have a significant negative impact on credit union members. We are concerned that a significant portion of credit union members who would benefit from these products will elect not to purchase them because they are told that these are bad and inferior products. This decision to not purchase these products will potentially

expose them to unnecessary risks if they are unable to make future payments.

We urge the Federal Reserve Board to change these disclosures so that they will instead reflect accurate, fair, and objective information about these payment protection products. The government does not promote certain types of products and services in other industries and has no reason to do so for insurance products.

Sincerely,

Becky DeVries