

From: Smart Financial Credit Union , Loretta Wolsey
Subject: Regulation Z - Truth in Lending

Comments:

Loretta Wolsey

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Dear Federal Reserve Board:

Smart Financial Credit Union is very concerned about the proposed change to the disclosure for credit life and disability products. It appears from the model disclosure that although the intent is to educate the consumer, it does so in a negative light.

We want the member to be educated and fully understand products and services they buy. It is necessary to ensure that the education does not over shadow the usefulness and positive attributes fo the product.

When a consumer dies, the estate, family, is left to deal with all of the financial woes. If the deceased consumer has a car loan and has credit life, the family has one less thing to worry about. That is a benefit of the credit life product. Unfortunately, that is not mentioned in the disclosure.

How many financial institutions can predict the financial circumstances of a consumer? If we could we would not need the products and services for credit life and disability. We assist our members by providing to them products that we hope they never need to use, but without the product, they would fall into financial ruin.

Help the consumer more by explaining the benefits as well as the drawbacks. You are not serving the needs of the consumer when the information you provide is slanted. Isn't that what you are supposed to be protecting them from??

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.

Sincerely,

Loretta Wolsey