From: Jonathan T Otterson

Subject: Regulation Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth In Lending Act

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## Comments:

I WORK IN A FINANCIAL INSTITUTION THAT PROVIDES BORROWERS THE OPPORTUNITY TO PURCHASE CREDIT INSURANCE PRODUCTS ON THEIR LOANS. FROM 2007 TO 2010 108 DEATH

CLAIMS WERE PAID TOTALLING \$xxxxxxx THAT COSIGNERS OR SURVIVORS DID NOT HAVE TO PAY. DISABILITY BENEFITS TOTALLING \$xxxxxx WERE PAID ON BEHALF OF 286 BORROWERS. tOTAL BENEFITS PAID TO BORROWERS FOR THE PERIOD WAS \$.87 OF EVERY PREMIUM DOLLAR COLLECTED. I FEEL THE PROPOSED LANAGUAGE IS HARSH AND VERY ONE

SIDED. CREDIT INSURANCE PRODUCTS ARE REGULATED BY INDIVIDUAL STATE INSURANCE DEPARTMENTS THAT ALREADY REQUIRE COST AND BENEFIT DISCLOSURES. I FEEL THIS IS AN AREA BEST LEFT TO THE STATES TO REGULATE.