



12-21-10

Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue N. W.  
Washington, DC 20551

RE: Proposed Changes to Credit insurance Disclosures under Regulation Z and the Truth  
In Lending Act  
Docket No. R-1390

Dear Board of Governors:

I am writing in opposition to the proposed amendments to the credit insurance and debt protection disclosures under Regulation Z on behalf of Idaho Advantage Credit Union.

We believe that the proposed amendments would have a significant negative impact to credit union members, credit unions, and the entire credit union industry. These proposed changes could potentially expose our members to unnecessary financial and credit risks if they decide not to purchase credit insurance on their loans. Also we feel that the proposed changes are misleading and inaccurate and misrepresent the purpose and value of payment protection products to credit union members.

Idaho Advantage 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 that reads "Christi Harris". The signature is written in a cursive, flowing style.

Mrs. Christi Harris  
VP Lending  
IACU