

Ben E. Keith
Employees Federal Credit Union

PO Box 2628 • Ft. Worth, TX 76113

December 23, 2010

Jennifer Johnson
Secretary, Board of Governors of the Federal Reserve System
20th Street and Constitution Ave, NW
Washington, DC 20551

RE: Docket No R-1390, Regulation Z; Truth in Lending

Dear Ms. Johnson,

My name is Susan Bartek and I am the manager of Ben E. Keith Employees FCU, asset size 6 million in Fort Worth, Texas. I am writing this letter today regarding the proposed disclosures regarding credit life insurance.

The proposed language in this disclosure misrepresents the purpose and value of the product. As a credit union Manager I support fair and accurate disclosures, this proposed disclosure is overly negative, unclear and inaccurate at best. This disclosure could discourage members who have no other options when it comes to this type of product, this could unnecessarily put our credit union members financial futures at risk.

The costs of these products decrease as the balance of the loan is paid down. The proposed disclosure does not take that into consideration and actually misleads the member into believing that the maximum monthly is far greater than it actually would be.

This is an example of the federal government over reach, insurance regulation is a state regulatory role, and states have their own insurance disclosure rules.

I have been a credit union employee for 14 years, and during those years I have seen time and time again how these products benefit credit union members, and the premium costs on these products are small in comparison to the benefits received.

Sincerely,

Susan Bartek
Manager
Ben E. Keith Employees FCU