



777 Walker, Suite 2300
Houston, Texas 77002

December 14, 2010

Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

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

I have become aware of the proposed changes to the disclosure language for credit insurance and debt protection disclosures under Regulation Z, and wish to declare my opposition on behalf of the members of People's Trust Federal Credit Union.

We have many members who have benefited from credit life and disability insurance. One recent example is a member whose husband was recently killed; she contacted us to pick up her husband's vehicle for repossession, as she could no longer afford the payments. After discussing the situation with a member services representative, she discovered that the vehicle was covered by credit life insurance, and that the loan balance was protected. She was greatly comforted by the fact that she could retain the vehicle which was needed by the family for transportation.

I feel that the suggested disclosure language places a negative connotation on payment protection products and discourages their purchase without highlighting the benefits. The result could be exposing our members to unnecessary financial and credit risk if they decide not to purchase the products.

In addition, these disclosures will have a negative effect on the credit union's non-interest fee income, and may increase the credit union's risk of loan losses and charge-offs since fewer people are likely to purchase the products.

People's Trust has always supported fair and accurate disclosures; please revise the proposed amendments in order to provide our members with more balanced information about payment protection products

Sincerely,

Virginia Goodson

People's Trust Federal Credit Union

