



CT Waco FCU
PO Box 20245
Waco, TX 76702

December 23, 2010

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

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

Dear Ms. Johnson,

I am writing to you on behalf of CT Waco Federal Credit Union. CT is located in Waco, Texas, has five million dollars in assets, and 1380 members.

Full disclosure on any and all financial products offered to the public is vital. However, the language as written in the proposed legislation is negatively biased to credit insurance products. It may cause our members confusion as to the value of the product, and the protection it can provide.

The Texas Department of Insurance has strict disclosure requirements in place to protect consumers. This proposed legislation would be redundant and unnecessary.

I have been in the Credit Union industry for twenty years, and time after time I have seen credit insurance products provide an additional layer of financial protection for borrowers who have become disabled, or for the surviving spouses of borrowers. In two instances I have seen this product pay off the mortgage for the surviving spouse, allowing them to use other life insurance to help them in other areas. In this economy, where so many homesteads are at risk, this added protection can mean the difference between keeping, and losing a home upon the death of a spouse.

I urge you to revisit the proposed regulation, and to change the verbiage to reflect accurate and objective information about payment protection products.

A handwritten signature in black ink, appearing to read "Tina Cross", written in a cursive style.

Tina Cross
Manager
CT Waco Federal Credit Union