

December 22, 2010

Dear Federal Reserve System
Board of Governors:

RE: Proposed Changes to Credit Insurance Disclosures
Docket No. R-1390

Wichita Falls Teachers FCU
4301 Barnett Rd.
Wichita Falls, TX 76310
62M Assets

I am asking you to seriously reconsider the current proposed changes to credit insurance disclosures under Regulation Z and the Truth-in-Lending Act. The proposed changes do not reflect, in my opinion, a true and fair picture of the benefit of offering credit life and disability insurance to our credit union members.

Credit life and disability insurance is a VOLUNTARY benefit that we have been able to provide to our members. Credit union members are not required to obtain this insurance, but they should have the ability to make an informed decision based on accurate information. The language used in the current proposals has a very negative implication and strongly discourages the purchase of this optional insurance.

For the normal consumer, insurance is bought with the intent to never have to use it. But people are extremely grateful to have it when they do need it. When a spouse dies, they are comforted to know that they have credit life insurance on their loans and it will be paid in full. For some credit union members, this may be the only type of insurance they have.

I urge you to please reconsider the current regulatory changes that may affect thousands of consumers.

Sincerely,

Patsy Ferguson
AVP-Operations