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January 6, 2011

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

Re: Docket No. R-1390 - Proposed Rules for Additional Consumer Disclosures under
Regulation Z, Truth-in-Lending

Dear Ms. Johnson,

I am writing to express my concern over the Federal Reserve Board's Regulation Z, Truth in Lending proposal. This proposal, as I understand it, was created to better educate and inform loan applicants when they are presented with disclosures pertaining to credit life insurance, credit disability insurance and debt collection/debt suspension products. As President and CEO of Taleris Credit Union, I fully support any proposal that will further the understanding of any credit related disclosure. However, your proposed disclosures go far beyond simply educating or informing.

The verbiage used in your model forms is, without a doubt, vague, misleading and overly negative towards these credit related products and services. Upon reading these disclosures, most consumers would be led to believe that these products and services are overpriced, worthless and a waste of their money. It appears to me that the Federal Reserve Board is clearly prejudiced against these products and services and chooses to use this proposal to try and eliminate them by discouraging consumers to purchase them.

Taleris Credit Union has, in the past year alone, had a number of members who have benefitted from these products and services. The one particular case that comes to mind concerns an elderly couple with a home equity loan. The husband passed away and the wife was unemployed. Thanks to the credit life insurance coverage, the loan was paid in full and she did not have the burden of paying off this debt.

If approved, these proposed disclosures would, undoubtedly, cause a disservice to our members who would decline these products and services based on your negative verbiage and lose the opportunity for the benefits they could provide.

I respectfully ask that you reconsider this proposal and revamp the disclosures to eliminate the negativity and bias that is clearly present in these disclosures.

Thank you for your consideration in this matter.

Sincerely,

Robin D. Thomas
President/CEO