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Central States Health & Life Co. of Omaha

July 18, 2011

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

BY EMAIL: regs.comments@federalreserve.gov.

RE: Regulation Z Docket No. R-1417
RIN 7100-AD75

Dear Secretary Johnson:

Central States Health & Life Co. of Omaha (CSO) is responding to the request for public comment on proposed rule amendments to 12 CFR Part 226, Regulation Z, docket R-1417 under the Truth in Lending Act (TILA).

CSO's primary business focus is the sale and administration of debt protection products in the form of voluntary credit insurance and debt cancellation programs offered directly by community banks and credit unions as well as local automobile dealers. CSO is among the top 5 U.S. writers and servicers of credit insurance and debt cancellation protection. We were founded in 1932 during the Great Depression, and have over 75 years of experience in the debt protection business.

We are members of the Consumer Credit Industry Association (CCIA) and we agree with the comments submitted in their letter dated July 13, 2011, regarding the proposed amendments set forth in R-1417. We encourage the Board to consider their comments regarding the need for consistency in the use of terms as between the proposed regulation changes and the Dodd-Frank Act. We also want to specifically go on record in support of need for revision of the language of Section 226.32 (b) (1) (iv) as outlined on Page 27481, to include the additional language from Section 1414 of the Dodd-Frank Act which is underlined in the following paragraph.

"226.32 (b) (1) (iv) Premiums or other charges payable at or before closing of the mortgage loan for any credit life, credit disability, credit unemployment, or credit property insurance, or any other life, accident, health, or loss-of-income insurance, or any payments directly or indirectly for any debt cancellation or suspension agreement or contract. This section does not apply to any product(s) authorized in Dodd-Frank Section 1414. Credit insurance premiums or debt cancellation or debt suspension fees calculated and paid in full on a monthly basis shall not be considered financed by the creditor."

Thank you for your time and consideration in this matter. We would be happy to provide any additional information or input in crafting language as appropriate. Please feel free to contact us if you have any questions.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Karen A. Sandberg".

Karen A. Sandberg, ALHC
Second Vice President, Compliance
Central States Health & Life Co. of Omaha

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