

June 1, 2005

Proposed Rule for FDICIA Disclosures, Matter No. R411014
Federal Trade Commission/Office of the Secretary
Room H-159 (Annex A)
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

To the Secretary:

Blackhawk Area Credit Union serves over 6,500 members in six northwest Illinois counties. Our credit union became privately insured before June 19, 1994. I am writing in opposition to the agency's proposed rule governing consumer disclosure requirements for privately insured credit unions AND to request that the FTC's final rule exempt all credit unions privately insured on June 19, 1994 from securing signed acknowledgments from all members.

BACU became privately insured in September of 1984. Compliance records for the FDIC Improvement Act of 1991 (1994 law) were destroyed in accordance with record retention policy. To require the credit union to obtain notices again would impose a significant operating and financial burden on BACU. Since then, BACU has required all new members sign acknowledgments which contain the required disclosure.

Regarding "all advertising" under the rule, it is unclear as to its meaning. For example, BACU has credit union uniform-type shirts with its logo on them. BACU also has give-aways such as pens and calendars. It would certainly be impractical to post the required notices in the above-mentioned items, not to mention being anti-competitive. I respectfully request that the FTC give consideration to regulatory exemptions/exclusions when finalizing its rule (NCUA Rule 740 and FDIC Rule 328).

In regard to printed materials, loan promotional materials have no consequence on a member's depository relationship with BACU. We would request that these types of materials be exempt.

Thank you for considering my message on this subject.

Sincerely,

BLACKHAWK AREA CREDIT UNION

Barbara A. Wisowaty, CCUE
President