



June 6, 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, D.C. 20580

Secretary:

As a \$14,525,784.54 credit union serving members in Middleburg Heights, Berea, Olmsted Falls, Brook Park and Olmsted Township located in Cuyahoga County in the State of Ohio, we are greatly concerned about the FTC's proposal that would require privately insured credit unions to disclose its insured status on all forms of advertising.

We believe that practicality, common sense and precedence should be considered, and that the agency should give some consideration to exclusions. For example, legible type on some promotional items would clearly be impossible, while attaching a disclosure statement that "This institution is not federally insured" on items of apparel borders on the ridiculous.

Both the Federal Deposit Insurance Corporation and the National Credit Union Administration have recognized specific exemptions where federally insured institutions are not required to inform consumers of their insured status, and we would ask that the FTC consider these as appropriate and incorporate them into its final rule.

Thank you for your attention to this important issue.

Sincerely,
Drema A. Braun
Treasurer/CEO