

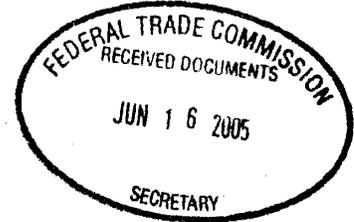


Monterey
CREDIT UNION

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June 14, 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



Dear Secretary,

Monterey Credit Union has been privately insured since September 1999, and is concerned over the agency's proposed rule governing consumer disclosures and what constitutes a "similar instrument evidencing a deposit".

We understand the FDIC Improvement Act of 1991 (FDICIA) requires we disclose the absence of federal insurance and the fact that no governmental agency guarantees that depositors will get their money back if we fail, on all periodic statements of account, signature cards, passbooks, and certificates of deposit. We have complied with these provisions since our conversion. However, if the FTC's interpretation of FDICIA concludes we must also place this disclosure on all deposit slips, tickets or receipts, 100% compliance would be impossible and the cost to the consumer/member prohibitive.

Credit union members order deposit slips in conjunction with ordering checks. Numerous companies provide such printing services. While the credit union offers specific sources for checks and deposit slips, many of our members buy these services on-line or from other unaffiliated vendors. To request custom-ordered deposit slips from any vendor - assuming such service are even available - would be more costly to the consumer. Furthermore, if the member fails to secure such deposit slips, it would create an undue regulatory burden on the credit union to police this disclosure. Non-compliance would be pervasive.

We feel that such disclosures would be redundant, cost-prohibitive and unnecessary given the other forms of consumer disclosures required under the statute. Also we cite the fact that the NCUA specifically exempts deposit slips, tickets, or receipts from containing the required disclosure regarding the presence of federal share insurance.

Sincerely, 

J. Stewart Fuller
CEO, Monterey Credit Union