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Federal Trade Commission/ Office of the Secretary  
Room H-135 (Annex A)  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Re: Supplemental Proposed Rule for FDICIA Disclosures, Matter No. R411014

Dear Sir/Madam Secretary:

I am writing in opposition to the FTC's supplemental proposed rule governing consumer disclosure requirements for privately insured credit unions; wherein, the FTC suggests that privately insured credit unions should see that signage required of privately insured credit unions be imposed on all federally insured credit unions that are part of the same shared branching network.

Buckeye State Credit Union is a state-chartered credit union in Ohio, and have been serving members in three Ohio counties, employees of the U.S.P.S., Federal Employees and over 300 other businesses. Buckeye State Credit Union has been serving our membership since our chartering in 1933. Our credit union has more than 21,000 members accounting for \$ 70,000,000.00 in total deposit accounts and we operate six branches in addition to our main office. We are a full-service financial institution offering member's access to their accounts through the CO-OP a shared branching network.

Our credit union is part of a shared branching network that involves privately and federally insured credit unions with over 3,700 branches nationwide. For the FTC to require us to make our federally insured counterparts in the network post a sign in their credit union lobbies stating that their credit union is not federally insured is illogical and impossible to achieve. It would be no different, if NCUA required us to post a sign stating we were federally insured.

We supply our members with full disclosure of our share insurance status. Transactions that are done at a shared branching facility follow the deposit rules, holds and disclosures of the member's home credit union, not the institution where the transaction is done, because of this, we recommend that the FTC re-examine its position on this matter and conclude that the language of the proposed rule is sufficient and that it only applies to those credit unions actually subject to regulation under FDICIA, or privately insured credit unions.

Sincerely,

Norma Sue Preston  
C.E.O. Buckeye State Credit Union