



# MAZUMA<sup>®</sup> CREDIT UNION

Turning Dreams Into Reality<sup>®</sup>

June 2, 2009

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 Mr. Clark:

I am writing to voice my opposition to the FTC's supplemental proposed rule governing consumer disclosure requirements for privately insured credit unions; particularly with respect to how it affects the signage in the shared branch facilities of federally-insured institutions.

I represent Mazuma Credit Union, which has proudly served the greater Kansas City MO area since 1948. We have over 52,500 members at Mazuma with over \$330 million in total share/deposit accounts. We provide our members a full range of financial services in each of our 10 branch offices and we also participate in the FSCC shared branching network, a vital service through which we provide members access to their accounts. Within this shared branching network, in addition to our credit union members being served by other credit unions, we also perform basic transactions for members of other credit unions; including those that are not federally insured. In 2008 we provided over 26,000 such transactions.

I want to be clear that we take great exception to the FTC's explanation of the supplemental proposed rule Section 320.4(a)(1) suggesting that the disclosure signage required of privately insured credit unions must also be posted at our branches and other federally insured credit unions participating in the FSCC shared branching network.

We are subject to and fully comply with NCUA rules and regulations governing shared branching facilities within our credit union since we are a federally-insured institution. These rules direct us to advise our members that their accounts are federally insured, and in turn, remind visiting credit union members that their credit union may not be federally insured. These governing rules were made effective April 2009 and we find the new signage under these rules to provide a clear, concise and sufficient explanation of the insured status of members' accounts.

The FTC's suggestion that a privately insured credit union could effectively impose a sign stating "This institution is not federally insured" in our offices or at our teller stations or windows solely due to our affiliation with them through the 10 network branches conflicts with the NCUA's rules and will not only confuse the consumers/members but may actually mislead and alarm them. We believe this is an unwarranted extension of the intent of proposed rule as well as a direct opposition to the direction we receive from our own regulator. Thank you for reconsidering this critical item.

Respectfully submitted,

Robert W. Givens  
President/CEO

9300 Troost Ave. / Kansas City, MO 64131-3000 / (816) 361-4194 / [www.mazuma.org](http://www.mazuma.org)

