



**INTERNATIONAL HARVESTER
EMPLOYEE CREDIT UNION**

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

Secretary:

I am writing to voice my opinion opposing 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 shared branch facilities.

The federally-insured credit union I represent is International Harvester Employee Credit Union, which has proudly served the International Harvester Company, nka Navistar, as well as the communities of Clark & Champaign Counties since 1934. Approximately 15,000 members belong to our credit union with about \$143,000,000 in total share/deposit accounts. We give our members a full range of financial services in three locations of our own branches and we also participate in the 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.

Now I must state that we take exception to the FTC's explanation of your 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 shared branching network.

We are subject to 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 and concise 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 several thousand network branches conflicts with the NCUA's rules and will only confuse the consumers/members.

Respectfully submitted,

James E. Kitchen
President/CEO

JEK:jk