

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 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.

USA One National Credit Union, a state-chartered credit union in Illinois, has been serving employees of over 250 select employer groups, as well as community members throughout the Chicago metropolitan area since 1986. We serve almost 10,000 members, accounting for \$35,559,242 in deposits. We serve these members through our main office, and one additional branch.

USA One is a full-service financial institution offering a wide variety of services; one of which is providing members access to their accounts through participation in the FSCC shared branching network. This network is critical to our success, as our members perform over 2,200 transactions each month at participating network branches. Without this network, we could not meet the needs of these members. We participate in the FSCC network under a contract that we cannot control or amend. As a network participant, we have no capacity to require federally insured credit unions, participating in the same network, to post a sign stating their credit union is not federally insured. These federally insured credit unions are already subject to NCUA regulations designed to remind visiting credit union members that their credit union may not be federally insured. The additional signage you are requesting will only confuse members and diminish the effect of the existing NCUA required signage.

Since our members already receive a wide variety of disclosures regarding the lack of federal insurance through other means, to require USA One to force signage at over 3,700 branches operated by other credit unions is not practical. Following the FTC interpretation could cause USA One to lose its rights as a participant in the shared branching network. This will reduce our ability to serve our members, resulting in a loss of membership.

As an alternative, we would propose that the posted signage be required only at teller windows and stations in facilities USA One owns or leases in its own name. Thank you for considering our concerns with this provision of the proposed rule.

Jerry Haley
President