



June 3, 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.

The Frontier Financial Credit Union, a state-chartered credit union in Nevada, has been serving employees of county government, healthcare and the community since 1958. Our credit union has approximately 9,000 members accounting for \$76.3 million in total deposit accounts and we operate four branches in addition to our main office. We are a full-service financial institution offering members access to their accounts through the CO-OP Financial Services and Financial Service Centers Cooperative shared branching networks.

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 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,

Bruce A. Rodela
President/CEO