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June 1, 2005

Proposed Rule for FDICIA Disclosures, Matter No. R411014  
Federal Trade Commission/Office of the Secretary  
Room H-159 (Annex A)  
600 Pennsylvania Avenue, N.W.  
Washington D.C. 20580

Secretary:

I am writing in support of the FTC's proposed rule governing consumer disclosures requirements as they relate to privately insured credit unions; specifically, the agency's position as to what constitutes "conspicuous disclosure."

The Credit Union of Ohio, a state-chartered credit union in the state of Ohio has been privately insured since 1967, and has been serving the State of Ohio Employees and the faculty and staff of The Ohio State University since 1967. Our credit union has 21,000 members comprising \$76,866,448 in total share/deposit accounts, and we believe strongly in the concept of clear, conspicuous and reasonable disclosure when it comes to all matters affecting our members and their financial relationship with us. also, we believe our credit union has complied with FDICIA in this regard since its enactment.

To this end, we endorse the FTC's well-established and tested view of what constitutes conspicuous disclosure as set forth in the preamble to your proposed rule. We encourage the agency to avoid any specific declarations regarding the font size, location, format or color of any consumer disclosures required of privately insured credit unions under FDICIA when preparing its final rule. The determination of whether a disclosure is conspicuous should be left to the best judgment of the privately insured credit union, as long as it gives due consideration to the proximity, presentation, placement and presence of the disclosure.

Thank you for considering our input on this important subject.

Respectfully submitted,

Susan Birkhimer  
CEO

YOUR FINANCIAL RESOURCE PARTNER