



**SONEPCO  
FEDERAL CREDIT UNION**

6475 W. Sahara Ave. • Las Vegas, Nevada 89146

phone: (702) 871-0977  
toll-free: (800) 677-6602  
fax: (702) 871-5936  
web site: [www.sonepco.com](http://www.sonepco.com)

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



June 9, 2005

Secretary:

I am writing in regards to the FTC's request for comments on consumer disclosures made by privately insured credit unions.

One provision of your proposed rule that is particularly concerning, relates to the requirement that privately insured credit unions post a conspicuous notice stating that: "This institution is not federally insured." on its automated teller machines (ATMs).

Our credit union currently owns three ATMs located in our main office and various other facilities where our members work. As a member/owner in the CO-OP ATM Network our credit union participates in a multi-state ATM network that provides our members access to their funds through over 20,000 ATMs nationally – most of which, obviously, are not owned by this credit union. As a participant in this network, we are required to allow members of all participating credit unions to use our machines, and other institutions are required to allow our members to use their ATMs.

Posting the required disclosure on specified ATMs will only confuse the user, since our members ARE members of a credit union with federal insurance. From experience, I can truthfully say that members will not read the posted notice carefully enough to discern that it does not apply to our credit union or their accounts, in particular. We believe this specific requirement is far too broad and impractical. We would ask the FTC to consider removing the posting requirement on ATMs, leaving the posting requirement to the lobbies of privately insured credit unions.

Thank you for your consideration.

Respectfully submitted,

Susanne B. Longson  
President