



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

June 6, 2005

To Whom It May Concern:

Please consider this letter as comments to the Proposed Rule for FDICIA Disclosures, Matter No. R411014.

Regarding Section 320.4 (signage disclosures), the proposed rule is unclear in terms of: 1) How signage disclosures apply to leased ATMs or ATMs owned and managed by third party vendors on behalf of a non-federally insured financial institution. 2) The proposed rule does not make it clear that "network" ATMs need not have a signage disclosure (as a federally insured credit union we would object to having this type of signage on an ATM that our insured members use due to the confusion it would cause). 3) Although we are not currently part of a shared branch network, we would object to being required to have a signage disclosure in our branches just because members of a non-insured credit union are allowed to utilize the branch. 4) In terms of advertising in general, it needs to be clarified when the disclosures are needed rather than "without limit."

Regarding Section 320.5 of the proposed rule: The proposed rule is unclear and in need of clarification for financial institutions that have or will convert to private insurance. Converting financial institutions should not have to obtain a signed acknowledgement from every existing member, because this would be impossible to achieve and would severely disrupt the operations of the financial institution.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

Dan Paulson  
President/CEO

Mailing Address: P.O. Box 94138 Las Vegas, Nevada 89193-4138  
(702) 791-4777