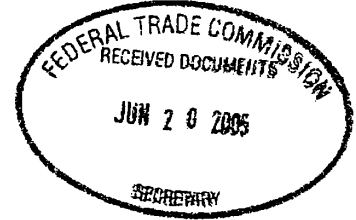




June 15, 2005

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,

Colorado Central Credit Union is a state chartered, federally insured credit union. It has approximately \$70 million in assets and 18,500 members. The credit union is part of the Co-op ATM network and CU Service Centers. The relationship with the Co-op ATM network allows the members of Colorado Central to deposit and withdraw funds at almost 20,000 ATMs throughout the US and Canada. Colorado Central's four ATMs are part of the network. Shared branching service is available to our members through CU Service Centers. This provides access to their accounts at close to 1,800 locations across the country. In addition, both of our locations provide shared branching transactions to members of other credit unions.

It is my understanding that there are some non-federally insured credit unions that are participants in CU Service Centers and/or the Co-op ATM network. As I understand the proposed rule on signage disclosures, any location, branch or ATM, that accepts deposits for a non-federally insured credit union would need to post a disclosure. Since the majority of credit unions are federally insured, this is an unnecessary regulatory burden and would be confusing to members of federally insured credit unions. It is appropriate for non-federally insured credit unions to disclose to their members, but should not be required for every participant in a shared branch system or ATM network.

Although it does not directly affect Colorado Central Credit Union, I believe the requirement to have 100% of members of non-federally insured credit unions to provide a signed acknowledgement of disclosure is an unreasonable expectation. Getting 100% of members to respond to any mailing is close to impossible. The refusal of a credit union to accept a deposit, based on lack of a signed disclosure, could damage the perceived safety and soundness of all credit unions.

Thank you for the opportunity to comment on this proposed rule. If you require any clarification of my comments please contact me .

Sincerely,

C. Michael Litzau, CCUE
President/CEO

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