



June 26, 2008

Ms. Mary Rupp, Secretary of the Board National Credit Union Administration 1775 Duke Street Alexandria, Virginia 22314-3428

Re: Comments On Proposed Changes to Part 740

Dear Ms. Rupp,

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on NCUA's proposal to revise the requirements for use of the official insurance sign and advertising statement. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 178 credit unions that have over 1.7 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

GCUL's Position:

In §740.5, NCUA requires insured credit unions to include the official advertising statement in all advertisements, including on their main internet pages, with certain exceptions. The basic form of the official statement is "This credit union is federally insured by the National Credit Union Administration." Currently, the regulation permits shortening the official statement to "Federally insured by NCUA" if used with a reproduction of the official sign in §740.4(b). NCUA proposes to revise §740.5(b) to permit insured credit unions to use, in addition to the basic form of the official advertising statement, the shortened form or the official sign in their advertisements.

We support this proposed change. In today's complex regulatory environment, every opportunity to simplify compliance burdens, without jeopardizing the safety and soundness of credit unions, is appreciated.

Thank you for the opportunity to comment on the proposed changes. If you have questions about our comments, please contact Cindy Connelly or me at (770) 476-9625.

Respectfully submitted,

Richard Ellis

Vice President/Credit Union Development

Georgia Credit Union League