

October 21, 2008

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

RE: Comments on Proposed Rule Part 12 CFR Part 740, RIN 3133-AD52
Accuracy of Advertising and Notice of Insured Status

Dear Ms. Rupp:

On behalf of CU Cooperative Branching, LLC, I am providing comments to the National Credit Union Administration on the Board's proposal that would revise Section 740.4 of NCUA's rules. CUCB, LLC is Louisiana's shared service center network, which currently has 61 participating credit unions and 90 locations across the state.

This rule currently requires that a federally insured credit union which accepts share deposits for both federally insured credit unions and nonfederally insured credit unions post a second sign adjacent to the official NCUA sign, listing each federally insured credit union served by the teller along with a statement that only these credit unions are federally insured. If approved, the revised rule would instead require the posting of a statement that not all of the credit unions served by the teller are federally insured and that members should contact their credit union if they need more information.

CUCB, LLC supports this proposal. In our view, the current requirement imposes an unreasonable burden on credit unions participating in the shared branching network. As NCUA undoubtedly recognizes, when this rule was originally implemented in 1971, the shared branching network was nowhere near the size it is today. Today, the number of credit unions participating in the shared branching network nationwide, along with the frequency with which new credit unions are added to the network, makes this requirement impractical and unfeasible. While we understand the need to eliminate any potential misunderstanding by consumers whose credit unions may not be federally insured, since there are only 33 credit unions in the entire nationwide network that are not federally insured the current rule does not seem like the most sensible way to achieve this goal.

Instead, the proposed rule requiring a statement that not all of the credit unions served by the teller are federally insured and that members should contact their credit union if they need more information, along with the official NCUA sign, appears to be a much more workable solution. This would also encourage any concerned members to contact their credit union directly, and then the credit union would have the opportunity to explain their

CU COOPERATIVE BRANCHING, LLC

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share insurance coverage to their own members directly. Furthermore, it would alleviate the burdensome signage requirement for shared service center locations.

Thank you for the opportunity to comment on this proposed rule. CU Cooperative Branching, LLC and our participating credit unions recognize the challenge NCUA faces as the agency responsible for the safety and soundness of America's credit union system, as well as the responsibility you face in keeping consumers correctly informed of their insurance coverages. We appreciate your difficult responsibility and value our opportunity to have our opinions considered as you make new regulations. Please feel free to contact us if we can be a source of additional information about our position on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne M. Cochran". The signature is fluid and cursive.

Anne Cochran, President/CEO
Louisiana Credit Union League
CU Cooperative Branching, LLC

AC/jg

cc: Chairman Fryzel
Vice Chairman Hood
Board Member Hyland
Mary Dunn, CUNA Sr. VP