

December 22, 2008

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

Re: Comments on Display of Official Sign; Temporary Increase in Standard Maximum Share Insurance Amount; Coverage for Custodial Loan Accounts

Dear Ms. Rupp,

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on NCUA's proposal to amend §740 and §745 of its rules pertaining to the display of the official sign, maximum insurance coverage and insurance coverage of custodial loan accounts. 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 176 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.

#### **Temporary Increase in Share Insurance Coverage**

GCUL commends the Agency on its efforts to clarify and simplify compliance with the rules by revising them to reflect the passage of The Emergency Economic Stabilization Act of 2008. This law temporarily increases the standard maximum share insurance amount (SMSIA) from \$100,000 to \$250,000, effective October 3, 2008 and ending December 31, 2009. It is our view that NCUA has offered the maximum amount of flexibility with the official logo. Allowing insured credit unions to display the current sign without penalty, alter existing signage, or post additional signs provides a great deal of discretion for credit unions. These options have been particularly helpful where an immediate need to communicate the increased coverage to our members was of importance. This quick response by the Agency has certainly been of benefit where consumer confidence with the state of the nation's financial system has been challenged.

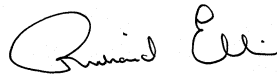
### **Custodial Loan Accounts**

The titling change of custodial loan accounts, §745.3(a)(3), to “mortgage servicing accounts” more appropriately represents the coverage and content of this Section. Any opportunity taken to simplify the explanation of content of the Rules and Regulations, even if in a name change, is a welcomed update.

We commend the Agency for making these changes and are pleased to support the rule revisions as proposed. Additionally, we encourage the Agency to continue with additional evaluations of its rules in order to make subsequent revisions when necessary.

Thank you for the opportunity to comment on the proposal to amend Parts 740 and 745. If you have questions about our comments, please contact Cindy Connelly or me at (770) 476-9625.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard Ellis". The signature is fluid and cursive, with the first name "Richard" written in a larger, more prominent script than the last name "Ellis".

Richard Ellis  
Vice President/Credit Union Development  
Georgia Credit Union League