

Jordan, Sheron Y

From: Corinne Coyle [ccoyle@acuiowa.org]
Sent: Monday, October 20, 2008 12:07 PM
To: _Regulatory Comments
Subject: 12 CFR Part 740 Comments

While this proposed rule is an improvement, I still believe such signs intended for “guest members” will cause too much confusion for our own members when they come in as well as members of other NCUA insured credit unions. In this time where credit unions and NCUA alike are working hard to reassure credit union members that their funds are federally insured, it is critical that we don’t take action that will cause more doubt as to whether or not we have NCUA insurance. Many credit unions that participate in Shared Branching do not have the luxury of setting aside a special teller window designated just for shared branching.

I would like to suggest an alternative which would be to hand a disclosure to guest members stating the required wording, “This facility..... If you need information on the insurance status of your credit union, please contact your credit union directly.” It just makes more sense to disclose to those that may potentially belong to a non-NCUA insured credit union than to have signs for all to see when less than 1% of people using the teller line are “guest members”.

Thank you for your consideration!

Corinne Coyle
President/CEO
Advantage Credit Union
121 W. 3rd Street N.
Newton, Iowa 50208
www.acuiowa.org