Jordan, Sheron Y

From: Steve Dahlstrom [steved@stcu.org]
Sent: Wednesday, October 22, 2008 2:42 PM

To: _Regulatory Comments

Subject: Steven L. Dahlstrom: Comments on Accuracy of Advertising and Notice of Insured Status

Support

I am writing today in support of proposed rule §740.4, concerning the accuracy of advertising and notice of insured shares for federally insured credit unions participating in shared branching networks.

I currently serve as Chairman of the FSCC Board of Directors. This rule will provide three much needed and timely primary benefits:

- It makes the signage regarding deposit insurance to shared branch members more meaningful.
- It acknowledges the difficulty faced by federally insured acquirer credit unions in complying with the old rule.
- It does not restrict the ability of non-federally insured credit unions to be full participants in the shared branch network.

Drawback

However, there is one drawback to the proposal. It would be more economical to allow the federally insured acquirer credit union to post the second sign in a centrally located place rather than adjacent to every NCUA insurance sign in the credit union. I do not believe this would create any confusion.

At STCU, is has been our experience that the members are well aware of the status of their shares in their "home" credit union. Our tellers believe they are merely acting as a conduit for these transactions. In fact, all members are better served because of this cooperation between credit unions.

I applaud the NCUA for this proposal.

Steve Dahlstrom | President/CEO

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