



November 20, 2008

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

Dear Ms. Rupp:

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

On behalf of the California and Nevada Credit Union Leagues, I appreciate the opportunity to comment on NCUA's proposed amendments to Part 740, which addresses Accuracy of Advertising and Notice of Insured Status. By way of background, the California and Nevada Credit Union Leagues (Leagues) are the largest state trade associations for credit unions in the United States, representing the interests of more than 400 credit unions and their 9 million members.

Currently, §740.4 of NCUA's rules requires that a federally-insured credit union continuously display the official NCUA sign at every teller station or window where insured funds or deposits are normally received. Section 740.4(c) requires that tellers that accept share deposits for both federally insured credit unions and non-federally insured credit unions also 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. The proposal 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.

The Leagues are pleased to support the proposal, and congratulate NCUA on recognizing the need to address the current burdensome and outdated rule. The sizable number of credit unions participating in the shared branching network nationwide (over 3400), the frequency with which new credit unions are added to the network, and the small number of non-federally insured credit unions which belong to shared branching nationwide combine to make the current requirement impractical and unfeasible. We believe the proposal takes into consideration these issues, while assuring clear and meaningful member disclosure. Further, the revised signage may encourage members of non-federally insured credit unions to contact their credit

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union directly, providing that credit union the opportunity to inform their member of the similarities and differences between federal and private insurance.

I thank NCUA for the opportunity to comment on this issue. We applaud the effort put forth by the agency in developing the proposed rule, and continue to appreciate your consideration of our views.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Cheney', with a long horizontal flourish extending to the right.

Bill Cheney  
President/CEO  
California and Nevada Credit Union Leagues