

November 20, 2008

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

Re: Comments on Proposed Rule 740.4, Accuracy of Advertising and Notice
of Insured Status

Dear Ms. Rupp,

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on NCUA's proposal to amend §740.4(c) of its rules which requires that tellers accepting share deposits for both federally insured credit unions and non-federally insured credit unions post not only the official NCUA sign regarding the federal insurance coverage of accounts, but also a second sign adjacent to the official NCUA sign. 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.

GCUL commends the Agency on its efforts to clarify and simplify compliance with the rules by revising them to reflect the advances in technology and business practices utilized in today's credit union marketplace. Shared branching has developed into an efficient and cost-effective way of addressing the convenience needs of credit unions and their members across the country and around the world. As the Agency notes in the proposal, the evolution of shared branching has created the ability of hundreds of credit unions throughout the country to share service locations and provide various transaction services to their members. However, these developments have caused the existing signage rule requirements, as initially adopted in 1971, to become impractical, inefficient and overly burdensome to comply with.

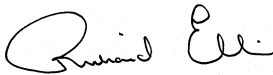
According to the proposal, the revision to §740.4(c) retains the general prohibition on federally insured credit unions receiving funds at any teller station or window where any non-federally insured credit union also receives account funds. The proposal contains three exceptions to this prohibition. The first two exceptions permit tellers at federally insured credit unions and shared branches operated by non-credit union entities, such as

credit union service organizations (CUSOs), to receive deposits for non-federally insured credit unions if tellers post a second sign adjacent to the official NCUA sign at each teller station where deposits are received. In lieu of a listing of all federally insured credit unions as required in the current rule, the revised second sign will state that the credit union or facility participates in a shared branch network and accepts deposits for members of other credit unions, not all of which are federally insured. The revised second sign, which will be created by the Agency, will advise members to contact their credit union for information about its insurance status. The third exception to the general prohibition addresses signage requirements at non-federally insured credit unions. The proposal clarifies that tellers in non-federally insured credit unions may accept deposits for federally insured credit unions as part of a shared branch network. The proposal, however, forbids a non-federally insured credit union from displaying the official NCUA sign, as this could be very confusing to the members of the non-federally insured credit union. Also, since the credit union will not display the official sign, there is no need for it to display the second sign.

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 other revisions resulting from similar advances.

Thank you for the opportunity to comment on the proposal to amend Part 740.4. If you have questions about our comments, please contact Cindy Connelly or me at (770) 476-9625.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Richard Ellis".

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