

April 2, 1996

James M. Rockett, Esq.
McCutchen, Doyle, Brown & Enersen, LLP
Three Embarcadero Center
San Francisco, CA 94111-4066

Re: Investment Product Sales Disclosures (Your Letter of February 29, 1996)

Dear Mr. Rockett:

You represent a registered broker-dealer that enters into networking arrangements with financial institutions, including federal credit unions (FCUs), to market non deposit investment products from the premises of such institutions. You note the requirements of NCUA Letter to Credit Unions No. 150 regarding disclosure of the non insured, non guaranteed status of such products and ask whether FCUs may use shorter, logo format disclosures in certain situations.

Although NCUA is not a signatory to the Interagency Statement on Retail Sales of Nondeposit Investment Products (the Interagency Statement) issued by the federal banking agencies in February 15, 1994, we have suggested that FCUs may turn to it for guidance with respect to issues that are not addressed by Letter No. 150 or opinion letters from this office. We take the same position with respect to the Joint Interpretations of the Interagency Statement (Joint Interpretations) (enclosed), issued by the banking agencies on September 12, 1995. The Joint Interpretations states that shorter, logo format disclosures may be used in visual media, such as television broadcasts, ATM screens, billboards, signs, posters, and in written advertisements and promotional materials, such as brochures. Consistent with the guidelines of the Joint Interpretations, FCUs also may use logo format disclosures.

Sincerely,

Richard S. Schulman
Associate General Counsel

GC/LH:sg
SSIC 3501
96-0307
Enclosure