

**Jordan, Sheron**

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**From:** \_Regulatory Comments  
**Sent:** Friday, August 11, 2006 9:07 AM  
**To:** Jordan, Sheron  
**Subject:** FW: Texans Credit Union Comments on Proposed Rule Part 740

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**From:** Jeanine Cadena [mailto:Jeanine\_Cadena@texanscu.org]  
**Sent:** Thursday, August 10, 2006 11:21 AM  
**To:** \_Regulatory Comments  
**Cc:** syashewski@tcul.coop  
**Subject:** Texans Credit Union Comments on Proposed Rule Part 740

Texans Credit Union appreciates the opportunity to comment on the NCUA's Propose Rule for Part 740. The compliance, purchasing and marketing departments at Texans reviewed the proposed rule and offer the following comments.

We determined that the signage on the website and at teller windows and offices can be changed within the proposed 60 days. While we have numerous offices with specially designed signage, we would still be able to meet a 60 day deadline and feel that this is a reasonable time frame for NCUA to impose.

However, the proposed rule would also require that we replace all printed material with the new logo within 60 days. It is our position that 60 days to replace printed material is not reasonable. Most, if not all, of our printed material contains the NCUA logo. We order, at minimum, a six month supply of the most frequently used materials and a larger supply of less frequently used material. Ordering bulk quantities is the most cost-effective way to manage our numerous printed materials. Our purchasing department estimates that replacing our existing stock of printed material would cost approximately \$30,000.00. Texans has not budgeted for this cost this fiscal year. Further, we will be forced to create a great deal of waste if we are required to simply throw out all of our existing stock in order to comply with the new logo on printed material. A longer time frame which may allow credit unions to change to the new logo in the usual course of reordering printed material seems a more responsible option. We propose, at a minimum, a one year period from the time the new logo becomes available to replace printed materials.

Jeanine Cadena  
General Counsel  
Texans Credit Union