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**KEESLER FEDERAL CREDIT UNION**

Mary Rupp

National Credit Union Administration  
1775 Duke St.  
Alexandria, VA 22314-3428

Re: Proposed Revisions to the Official Sign Indicating Insured Status

Keesler Federal Credit Union is the largest Federal Credit Union in Mississippi, with branches in Mississippi and the United Kingdom. We appreciate the opportunity to comment on the proposed revisions to 12 C.F.R. Part 740.

Keesler FCU would like to direct its comments to two issues. First, the NCUA has proposed a period of 60 days for adherence in displaying the official sign. As you know, credit unions display the official sign in a number of different venues. Some of these include:

- 1) Television advertisements over 30 seconds.
- 2) Website Pages
- 3) Billboards
- 4) Informational Brochures
- 5) Calendars of appropriate size
- 6) Yellow page advertisements.

Some of these brochures are ordered in the thousands, and may take from 6 months to a year to use. Calendars and Yellow Page ads run for an entire year. Agreements are made to provide television spots and billboards well in advance of their appearing.

It is Keesler's position that a 60 day compliance requirement would not be practical. Credit Unions should have a time period that would allow them to exhaust current supplies of promotional materials. On annual items, they should be allowed to change the sign upon yearly renewal.

Second, Keesler would like to comment on the change in verbiage to the new official sign. The new wording has been changed to read "Your savings federally insured to at least \$100,000 and backed by the full faith and credit of the United States Government." Currently, certain IRA deposits are insured up to \$250,000. It is our belief that there should be reference made to this fact.

Again, Keesler Federal Credit Union appreciates the opportunity to be heard on these proposed regulatory changes. It is our hope that you will find this information useful.

Thank you,

Joel S. Gregory  
Asst. Vice President/Compliance  
228-385-4412



AMERICA'S CREDIT UNION