

**From:** [Cain, Carol](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments to Proposed Part 740 Changes  
**Date:** Monday, January 10, 2011 3:52:49 PM

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Hello, and thank you for the opportunity to comment on the proposed changes.

My comment is regarding the possible rescinding of the exemption of radio or TV ads that “do not exceed 30 seconds:”

We currently sponsor closed-captioning for our local ABC affiliate. Our sponsorship billboard allows us only seven (7) seconds to have a message. I do not believe that it is practical to use several seconds of that already very limited time to mention “Federally insured by NCUA.”

Perhaps you might consider exempting radio or TV that does not exceed 20 seconds...or 15 seconds. But I think that anything under 10-15 seconds is so brief, that it would make it completely impractical to use that spot format. Also, :60 radio and television is getting cost-prohibitive and is not (in my opinion) the most effective format for advertising.

With some of the new federal regulations coming down, we are already doing our best to survive. Please do not further hamper us by mandating that our already expensive advertising be further shortened to include a statement that can easily be communicated in other manners and through other channels.

Thank you for your consideration,

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