

From: [Sharon Cook](#)
To: [Regulatory Comments](#)
Subject: Statement on Advertising
Date: Friday, January 21, 2011 3:22:03 PM

January 21, 2011

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

Dear Ms. Rupp:

After carefully considering the proposal by the NCUA Board, Mountain America Credit Union firmly believes that the official advertising statement rule should not be revised.

While we agree that it is important for consumers to know that share accounts are federally insured by NCUA, we feel that the current rule sufficiently addresses this issue. Moreover, the proposed revisions would add unnecessary constraints to the advertising efforts of credit unions.

This constraint is most evident in radio advertisements. By adding the official statement to radio advertisements less than 30 seconds in length, many credit unions would need to eliminate a portion of their radio marketing strategy. For example, requiring the statement on a 10-second public announcement would be impractical due to the ad's brevity.

Mountain America employees many of these brief radio advertisements because of their affordability (longer spots typically incur additional costs for studio time, voice talent and production.) Losing this medium would be detrimental to our marketing plans and our budget.

Similarly, we would object to the required use of a voice over to convey the official statement in a television advertisement less than 30 seconds in length.

Another matter of concern is the official statement's font size. We feel that it does not need to be adjusted, because the issue was properly addressed in 2008. That revision allows for the alteration of the official sign's text to ensure legibility. Many credit unions, including Mountain America, prefer to use the official sign, which does a better job of increasing consumer confidence and NCUA name recognition than a pure textual

treatment.

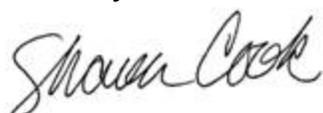
Mountain America also finds reason for concern in the proposed definition of advertisement as “a commercial message, in any medium, that is designed to attract public attention or patronage to a product or business. We feel this definition is too general and restrictive, thereby requiring its use where actually unnecessary. We would argue that an advertisement is a form of communication intended to persuade an audience take some action.

With this definition of advertisement in mind, we disagree with the credit union’s annual report is a form of advertisement since it does not persuade consumers to take action. Furthermore, labeling an annual report as an ad appears to contradict exclusion number 12, since an annual report does not relate directly to individual member accounts, but to the credit union’s financial activities and member equity in general.

In summary, Mountain America Credit Union is against revising the official advertising statement due to the constraints it would impose on radio and television spots less than 30 seconds long, the official statement as it appears in print, annual reports and other statements of condition, and the definition of advertising. We hope you understand why we are taking this position. If you need any clarification, please contact me a 801-325-6431.

Thank you for your time and consideration.

Sincerely



Sharon Cook
Senior Vice President Marketing and Public Relations
Mountain America Credit Union

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