



February 2, 2011

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

Dear Ms. Rupp:

Thank you for providing the opportunity to comment on the proposed regulation. After reviewing the proposal, America's Credit Union thinks that the official advertising rule should not be changed.

The current rule already adequately addresses the issue of educating members and consumers about NCUA insurance. Additionally, in light of the current economy, proposed federal regulations, and NCUA assessments, this rulemaking is costly to credit unions.

One of the larger burdens would be the requirement to add the official statement to radio and television ads less than 30 seconds in length. Many credit unions already invested large portions of their marketing budgets in production of commercials planned to run throughout the year. It would be very costly to reproduce these ads. Furthermore, in an ad that is only 10 seconds in length, it would be unrealistic to require an official statement.

The other item the legislation does not address is how long we would have to comply. Ideally, we would need 180 days or more based on current advertising that has been recorded and is running.

Thank you for your time and consideration.

Sincerely,
Heidi West
Director of Marketing & Business Development
America's Credit Union
253-912-3259