

From: [Darren Cameron](#)
To: [Regulatory Comments](#)
Cc: [Tom Alter](#); [Jackie Buchanan](#); "veronica.madsen@mcu.org"; [Teri Vollmar](#)
Subject: Darren Cameron Comments on Proposed Rule 740, Accuracy of Advertising and Notice of Insured Status
Date: Monday, February 14, 2011 5:04:01 PM

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

February 14, 2011

Regarding: NCUA Proposed Rule - Part 740

I am writing to comment on this proposed rule regarding the accuracy of advertising and notice of insured status. While I am very much in favor of promoting the fact that credit unions are federally insured by the NCUA, I am in opposition to Proposed Rule – Part 740.

My main concern is that while it may make sense to follow the suggested rule in many forms of advertising, there are other highly effective advertising tactics where it will not be possible to follow this rule. This includes the following specific examples:

1. Traffic Pulse radio sponsorships. This advertising tactic involves having an announcer at a radio station read a 10 second promotional statement just prior to reading the local traffic news. An example includes: “Our traffic update is brought to you by Genisys Credit Union. Now offering mobile banking and free eDeposits with every checking account. Call 1-800-521-8440 for details.” In this example, enforcing the “Federally insured by the NCUA” language would significantly reduce the effectiveness of the overall message since it would take up the majority of the 10 second radio ad. A Similar example to this one also pertains to 15 second television commercials known as “book-ends”. This form of television advertising is becoming more prevalent to increase the attention-getting aspect of the advertisement.

2. Newspaper and Billboard Advertising. There is some mention of this rule being broadened to also include a specific size requirement or minimum font size. In the case of newspaper or print ads, some of the space that we purchase is the size of a business card. An NCUA logo, especially one with a size minimum would reduce the effectiveness of this and significantly reduce the ability for us to effectively advertise our credit union. A second example that would be problematic for a size requirement is billboards. Highly effective billboards must contain a well-balanced mix of images, white space and minimal promotional copy. Genisys Credit Union does include the NCUA logo on billboards, but a size requirement would once again in this example, greatly interfere with the overall effectiveness of our message.

A final and just as important consideration is that in my opinion; credit unions are already making the NUCA logo as prominent as possible in print and billboards as well as using the “Federally Insured by the NCUA” language as much as possible in radio and television advertising. As a result, it’s not necessary to enforce mandatory guidelines.

It is for these reasons that I am opposed to NCUA Proposed Rule 740 dictating the exact use

of the NCUA advertising statement or NCUA logo size requirements.

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