

February 22, 2011

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

Dear Ms. Rupp:

Thank you for the opportunity to allow Pennsylvania State Employees Credit Union (PSECU) to provide comments on the National Credit Union Administration's (NCUA) proposed changes to the Accuracy of Advertising and Notice of Insured Status rule (12 CFR Part 740). While we agree that it is important for our members to realize that their accounts are insured by the NCUA, the proposal raises concerns in several areas.

First, the proposed rule changes relating to the NCUA language with regards to radio and television advertisements less than 30 seconds in length would greatly reduce the effectiveness of the messages credit unions wish to convey to consumers. Each medium provides inventories that include the lengths of 15, 10 and 5 seconds. This inventory is routinely used to offer sponsorship opportunities for traffic, news, weather, school closings, etc. The requirement to use the proposed NCUA language during these sponsorships would be impractical and would likely prevent our participation in such sponsorships.

Also, we routinely sponsor events for various charities in Central Pennsylvania and feel the addition of the NCUA language to these sponsorships would be confusing to the consumer and detrimental to the cause for these sponsorships.

Second, we also have concerns with the definition of "advertisement" as a "commercial message in any medium." We believe the term "any medium" should be examined by specific medium, such as newspaper, magazines, banners, etc. This raises particular concern with outdoor advertising not only from a practical messaging standpoint, but also from a public safety aspect. Requiring additional text on a billboard "no smaller than the smallest font size used in other portions of the advertisement intended to convey information to the consumer" introduces additional information that may be difficult to read, will clutter the design and layout of the advertising, and may cause a safety hazard for motorists. Additionally, we feel that the proposed font size requirement in all print mediums may encourage the insertion of additional content in a smaller font that would allow the advertisement to remain compliant, but will introduce confusion and clutter in doing so.

Lastly, we express our feeling that promotional items such as pens, pads, baseball caps and various novelty items should remain exempt from the NCUA language. It would be impractical to attempt to put the required NCUA insurance language on such small items.

Thank you for your time and consideration of our concerns for the proposed revisions to the NCUA's official advertising statement rule (12 CFR Part 740).

Sincerely,



Barbara J. Bowker
Vice President, PSECU Marketing