



November 10, 2017

Mr. Gerald Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexanria, VA 22314-3428

Delivery via email to regcomments@ncua.gov

Re: Rulemaking Regarding Accuracy of Advertising and Notice of Insured Status

Dear Mr. Gerald Poliquin:

Thank you for the opportunity to comment on the Accuracy of Advertising and Notice of Insured Status.

We agree with NCUA's proposal to provide regulatory relief by including a fourth version of NCUA's "official advertisement statement" to include "Insured by NCUA." We also agree with exemption of the "official advertisement statement" for radio advertisements under 30 seconds.

We believe the regulation could be further modified to support emerging advertising mediums including social media, mobile apps, text messaging, and digital ad networks, and ask that you consider the following suggestions:

- For social media postings, require that the "official advertising statement" appear only on the "cover or main page" of Federally Insured Credit Union's (FICU) social media site, as opposed to including the "official advertising statement" on every individual posting, provided the post re-directs to the FICU social media site or dedicated FICU webpage containing the "official advertising statement..
- For banner advertisements on 3rd party ad networks, require that the "official advertising statement" be one-click away, as opposed to including the "official advertising statement" on every individual banner ad, provided the banner ad re-directs to the FICU social media site or dedicated FICU webpage containing the "official advertising statement."

Thank you for the allowing us the opportunity to provide feedback.

Sincerely,

A handwritten signature in blue ink that reads "Denise Welden".

Denise Welden
AVP, Compliance
SAFE Credit Union