

December 1, 2017

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

RE: RIN-3133-AE78 –Accuracy of Advertising and Notice of Insured Status

Mr. Poliquin:

Communication Federal Credit Union wishes to provide the following commentary regarding the National Credit Union Administration’s (NCUA) proposed amendments to its official advertising rule. Communication Federal Credit Union supports the changes to lessen the regulatory burden for federally insured credit unions.

**Official Advertising Statement:**

Communication Federal Credit Union supports the proposed fourth option of “Insured by NCUA” as an official advertising statement. This change will reduce burden and streamline advertising disclosure.

**Radio and Television:**

Prior to 2011, credit unions were exempt from including the share insurance disclosure in radio and television advertisements less than 30 seconds in length. Following the change requiring the disclosure for advertisements longer than 15 seconds disadvantaged credit unions by adding an additional disclosure burden when compared with other financial institutions. Communication Federal Credit Union supports the change and reverting to the pre-2011 interpretation of exempting radio and television advertisements of under 30 seconds from this requirement.

**Social Media and Digital Communication**

With regard to social media and digital advertising and the application of the share insurance disclosure rule, we ask that NCUA recognize and consider the flexibility of this medium prior to implementing constraints. Following are suggestions, but Communication Federal Credit Union would ask that a proposed rule and comment period be issued and offered prior to the implementation of new requirements:

- Social media platforms such as Facebook, Instagram and Twitter offer bio sections which allow for the inclusion of limited text, such as the official advertising statement. Given the restrictions and limitations of these platforms, with regard to both posts and advertising, requiring additional disclosure within posts and advertisements would significantly reduce the ability of credit unions to effectively communicate via these channels. As digital communication evolves, it will become even more necessary for credit unions to communicate and remain relevant in the marketplace
- With regard to digital advertising, the very nature of the platform provides flexibility for users to easily link/click to additional information relating to the advertised product or service. Given this flexibility, we would ask that consideration be given to alternately display disclosure on a linked page, perhaps within one click, if not displayed in the actual advertisement. Additionally, popular digital advertising platforms restrict the amount of text contained within imagery. Regulation requiring all disclosure to be placed within the actual advertisement would disrupt a credit union's ability to communicate or advertise via these platforms. Again, the flexibility of digital advertising gives consumers the ability to easily access and view all required disclosure by simply clicking or linking to a page where this information may be easily displayed and viewed.

Finally, Communication Federal Credit Union is pleased that NCUA has sought commentary on these issues and supports the regulatory relief offered in the proposed rule. Should there be any questions relating to the included commentary, you may call me directly at 405.879.5650 or email [slark@comfedcu.org](mailto:slark@comfedcu.org).

Regards,



**Stephen Lark**

Vice President Corporate Development