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December 1, 2017

Gerard S. Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314– 3428

Secretary Poliquin,

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

We appreciate and agree with reinstating the exemption from the general rule requiring the use of the official advertising statement in television and radio commercials that are less than 30 seconds providing parity with FDIC rules. In addition, it will be beneficial to use the shorter statement of *Insured by NCUA* in a variety of marketing materials with limited space and viewing time as well as a direct cost per second ads such as commercials, TV and pre-roll videos. In addition, a shorter disclosure will be beneficial on print materials such as statement inserts and brochures that are standard sizes with limited space.

I would like to provide additional comments regarding the use of the notice of insured status on social media channels. Northwest Federal Credit Union uses many social media mediums such as Instagram where it is impractical to include the notice of insured status on the graphical image itself. It is our recommendation that NCUA include in its rules that it is compliant to include the notice of insured status within one-click from the advertisement along with the full disclosures for the promotion.

Thank you for the opportunity to provide comments. Should you have any questions or would like to discuss these comments further, please contact my VP of Marketing and Communications, Harmonie Taddeo at 703-709-8900 or htaddeo@nwfcu.org.

Sincerely,

A handwritten signature in black ink that reads "Jeff Bentley".

Jeff Bentley
President/CEO
Northwest Federal Credit Union