



OHIO CREDIT  
UNION LEAGUE

December 1, 2017

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

Re: Request for Public Comment Regarding Accuracy of Advertising and Notice of  
Insured Status  
RIN 3133-AE78

Dear Mr. Poliquin,

The Ohio Credit Union League (OCUL) welcomes the opportunity to submit comments concerning the National Credit Union Administration's (NCUA) proposed changes to certain provisions of the agency's advertising rule.

Despite prior parity between the Federal Deposit Insurance Corporation (FDIC) and NCUA as it relates to advertising and official sign regulations, in 2011 NCUA amended Part 740 by altering the advertising rule. Where banks are only required to include the designated FDIC advertising statement in radio and television ads that exceed 30 seconds, federally-insured credit unions must include NCUA's designated statement in radio and television ads that exceed 15 seconds.

We agree with NCUA; the reduction from 30 seconds to 15 seconds is unnecessary and has increased the regulatory burden in certain advertising situations. Additionally, we are supportive of the proposal to add a fourth option, "Insured by NCUA." We agree with NCUA that it will add flexibility while still maintaining the purpose of the rule.

While this proposed change may appear minute, the proposed change is in fact significant. The regulatory burden is not a result of one or two large regulations like Bank Secrecy Act rules or Telephone Consumer Protection Act compliance. Rather, the regulatory burden is a result of an aggregation of regulations from a myriad of federal and state regulators that now require credit unions to allocate resources to legal and compliance departments. OCUL appreciates NCUA's efforts to modernize regulations and enact only common sense regulations. We welcome changes that can collectively contribute to systematically reducing regulatory burdens.

We respectfully request that NCUA adopt the proposed rule. We applaud the agency's proposal to implement regulations that improve the operating environment for credit unions to further their mission, providing member-owners with consumer friendly, non-predatory financial products and services. If you have further questions or would like to discuss OCUL's comments in more detail, please feel free to contact us at 800-486-2917.

Respectfully,

Handwritten signature of Gerard Poliquin in black ink.

Handwritten signature of Miriam Lee in black ink.



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