



November 21, 2017

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

Dear Mr. Poliquin:

Re: RIN 3133-AE78 – Notice of Proposed Rulemaking Regarding Accuracy of Advertising, Part 740

Alaska USA Federal Credit Union (Alaska USA) is a federally chartered credit union with \$7.2 billion in assets that serves over 635,000 members throughout the United States. As such, the credit union appreciates the opportunity to comment on provisions that would provide regulatory relief to the advertising rule, NCUA's 12 CFR Part 740, Accuracy of Advertising and Notice of Insured Status. Specifically, on whether or not the regulation should be amended to facilitate new trends in online or digital media. Comments below focus on specific recommendations that balance the regulation's goal to inform the public, with space and other constraints inherent in new forms of media advertising.

The challenge credit unions face with online media, whether social or otherwise, is that these digital mediums are designed as extremely short-form communication. It's also true that credit union audiences have increasingly opted to use these new digital platforms due to speed and brevity.

According to several top digital marketing companies (e.g. MarketingProfs and Hubspot), a typical post to these channels can only be between 40-70 characters (well below the current 280 character limit of Twitter), for optimal viewer engagement. Even the shortest phrase, "Insured by NCUA" commands a significant amount of that allocation. Other formats restrict image aspect, forcing illegible content into a confined space. For example, Facebook presents a different type of challenge with digital advertising imagery, allowing only 20% of the image to have any text at all.


A potentially viable solution for more image-driven channels, like Facebook and Instagram, is the development of a "digital media only" version of a logo, designed and optimized for visibility and legibility in smaller screen-resolution displays that would support the purpose of the rule and likely alleviate specific text limitations (a logo vs. a phrase). There would need to be a reasonable effort by NCUA to promote this shorter mark to establish its meaning and boost recognition. Alaska USA would be supportive of NCUA's promotional strategies and public relations efforts to achieve this objective.

Text-based messaging is a much different type of challenge. We can only shorten "Insured by NCUA" so much, as a phrase. One option we would suggest might be to create a hashtag: #NCUAINsured or even #InsNCUA that could be used to trigger an action towards more detailed information. The hashtag approach would allow consistency across just about every social media platform, from Instagram to Facebook to Twitter and so on; it's a ubiquitous technique that is easily recognized by users.

Please also consider that in both the image-based and text-based solutions mentioned, the context of the communication (that it's originating from a credit union) will also add quick clarity and meaning to something like #InsNCUA.

In closing, while Alaska USA appreciates the criticality in utilizing the NCUA notice of insured status statement, it is in favor and support of the NCUA revising the advertising rule to address evolving forms of media advertising. Please contact me at r.marshall@alaskausa.org or (907) 786-2502 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Rochelle Marshall". The signature is written in a cursive, flowing style.

Rochelle Marshall
Senior Vice President,
Marketing