

December 04, 2017

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

RE: Comments on Proposed Rulemaking Regarding Accuracy of Advertising

Dear Mr. Gerald Poliquin,

I am writing on behalf of Patelco Credit Union, which serves Northern California. We have over 300,000 members and nearly six billion dollars in assets. Patelco Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rulemaking regarding accuracy of advertising.

While we did not think addressing the advertising rules for NCUA insurance warranted placement in the first year of your four-year review calendar, we generally agree with the changes you are proposing. It will be fair to allow credit unions the same 30 second time exemption banks have enjoyed since 2011. Similarly, it will be fair for credit unions to not need to include the official statement on statements of condition, the same as banks.

We disagree with the need to shorten the shortest version of the official statement to exclude "federally." Credit unions are not required to be insured by NCUA. Our own credit union was self-insured for a period when we were small. The purpose of the official statement is to instill confidence in depositors. By shortening the shortest form to say simply, "Insured by NCUA," the distinction of being federally insured will be lost on the casual consumer, especially for state-chartered credit unions.

The argument that this shortening is needed to accommodate social media is specious. Twitter just doubled its message length. Facebook, Instagram, and a myriad of other platforms are all image-based and an extra word of text will not make a difference. We will, of course, take advantage of a shortening of the official statement if it is finalized. We just don't think it is necessary.

Thank you for the opportunity to comment on this Proposed Rule and for considering our views.

Sincerely,

Jay Hartlove
Compliance Officer
Patelco CU

cc: CCUL