

December 1, 2017

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

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

Dear Mr. Poliquin:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the proposed Accuracy of Advertising rule.

HCUA supports the revision of the current advertising rules to put credit unions on an equal playing field with banks regarding advertising. In 2011, the National Credit Union Administration (NCUA) rule change required credit unions to include NCUA's official advertising statement in radio and television ads that exceeded 15 seconds. This change is more restrictive than banks since the Federal Deposit Insurance Corporation (FDIC) regulated banking institutions are not required to include the similar FDIC insurance statement unless such advertisements exceed 30 seconds. The proposed rule provides regulatory relief to rectify these inequities, and provide print, radio, and television advertising parity among banks and credit unions.

Additionally, the proposal to include a fourth iteration of the official advertising statement, namely stating "Insured by NCUA", would provide credit unions with more flexibility without diminishing the purpose of the rule. HCUA also supports the expansion of the NCUA's advertising rule to include other channels of advertising including but not limited to social media, mobile banking, short message (SMS), chats, tweets, and feeds. NCUA's regulatory relief and banking parity efforts help credit unions serve their members' cooperative financial interest.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas
President/CEO