

**Jordan, Sheron**

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**From:** \_Regulatory Comments  
**Sent:** Tuesday, July 18, 2006 9:34 AM  
**To:** Jordan, Sheron  
**Subject:** FW: El Paso Employees Federal Credit Union Comments on Proposed Rule Part 740

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**From:** Carolyn Kissick [mailto:ckissick@epfcu.org]  
**Sent:** Monday, July 17, 2006 11:48 AM  
**To:** \_Regulatory Comments  
**Subject:** El Paso Employees Federal Credit Union Comments on Proposed Rule Part 740

The proposed change for the NCUA logo does appear to be rather simple to comply with when one does not delve deeper into the course of action needed. Simply changing the NCUA logos on the teller stations and entrance locations for every office is rather straightforward and can be performed with a minimal amount of disturbance and cost. However, replacing brochures, disclosures and marketing pieces are a completely different story. The rule should consider these factors when determining the amount of time allowed for federally chartered credit unions to comply with replacement of the NCUA logo and verbiage. Our credit union generally orders a six month to one year supply of brochures and disclosures. A 60 day compliance time frame may pose an economic burden on credit unions, regardless of size, involving destruction of brochures and disclosures merely to comply with the new NCUA logo and verbiage. A more reasonable time frame for compliance with the new NCUA logo is one year rather than the proposed 60 days.

Sincerely,  
Carolyn Kissick,  
VP Operations  
El Paso Employees Federal Credit Union