

**Jordan, Sheron**

---

**From:** \_Regulatory Comments  
**Sent:** Thursday, July 27, 2006 3:41 PM  
**To:** Jordan, Sheron  
**Subject:** FW: SAFE Credit Union-Denise Welden: Comments on Proposed Rule Part 740

---

**From:** Welden, Denise [mailto:denise.welden@safecu.org]  
**Sent:** Tuesday, July 25, 2006 9:15 PM  
**To:** \_Regulatory Comments  
**Cc:** Vogan, Mary; Freeman, Ruth; Whiteley, Sharon; Black, Julie; Stuckey, Joel; Gullett, Bob  
**Subject:** SAFE Credit Union-Denise Welden: Comments on Proposed Rule Part 740

## Comments on Proposed Rule Part 740

The 60-day compliance requirement to post new NCUA signs at each station where deposits are accepted after receipt from NCUA is a reasonable period **only if** the sign dimensions requirements are unchanged. If the dimensions change, we propose a 120-day period to allow ordering of new Plexiglas holders and installation. In addition, for credit unions with a large number of branches spread out over a large geographic area, 60 days may **not** be a reasonable enough time period. Changes to websites can easily be made within 60 days.

However, we propose that the requirement to change out all other marketing materials that require the NCUA official sign (e.g advertisements, brochures, signage, letters, newsletters) be expanded to **at least a 12-month compliance period**. Expanding this period will lessen the economic impact/burden and avoid paper waste for credit unions and better match current pre-printed material replenishment supply cycles.

In addition, given that the proposed change in language for the signs is not materially different from existing signage and the change in coverage is **not** less for depositors, the \$100 penalty a day for violation is severe and unreasonable compounded with such a short proposed compliance date.

**Denise Welden**

Service Support & Compliance Manager  
SAFE Credit Union  
916-971-4509  
denise.welden@safecu.org

This email may contain confidential and privileged material for the sole use of the intended recipient and SAFE Credit Union. Any review or distribution by others is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

---

This e-mail has been scanned by MCI Managed Email Content Service, using Skeptic(tm) technology powered by MessageLabs. For more information on MCI's Managed Email Content Service, visit <http://www.mci.com>.

---