

Jordan, Sheron

From: _Regulatory Comments
Sent: Wednesday, August 09, 2006 8:28 AM
To: Jordan, Sheron
Subject: FW: Justice FCU - Comments on proposed Rule Part 740

From: Susan Baugh [mailto:baughs@jfcu.org]
Sent: Tuesday, August 08, 2006 11:51 AM
To: _Regulatory Comments
Subject: Justice FCU - Comments on proposed Rule Part 740

Below are our comments on the proposed change to Part 740 of the NCUA Rules and Regulations.

Regarding the 60 day time frame to comply with the proposed rule; a 60 day compliance deadline for displaying the revised signs would only be sufficient for teller windows and websites. However, currently we display the official NCUA sign on newsletters, product and services brochures, membership applications, and our membership agreement and disclosure booklet. With the exception of our newsletter, the remaining items are ordered in bulk in order to save money. We generally keep six to twelve months worth of items in our inventory. Consequently having to re-order the above items would be costly to Justice FCU. Specifically the membership and account agreement, as this booklet is multiple pages and is ordered through CUNA which requires lead time and review by multiple people both in-house and at CUNA, in July 2006 we finished the review and approved the revised booklet.

The average value of the inventory of our printed material is \$150,000. Given that all credit unions will be reordering at the same time we anticipate at least a 90 day lead time by our printers for delivery of revised items.

Based on the cost to reprint items as well as the lead time to make changes to brochures etc. we suggest either a six month compliance period for displaying the revised sign or a staggered compliance period, with 60 days for physical signs, websites and newsletters and six months for other membership applications, account agreement and disclosures and other printed marketing material.

Thank you for the opportunity to comment on this proposed rule change.

Sincerely,

Justice FCU