



TERRY J. JORDE  
*Chairman*  
JAMES P. GHIGLIERI, JR.  
*Chairman-Elect*  
CYNTHIA BLANKENSHIP  
*Vice Chairman*  
KEN PARSONS, SR.  
*Treasurer*  
ROBERT C. FRICKE  
*Secretary*  
DAVID E. HAYES  
*Immediate Past Chairman*

CAMDEN R. FINE  
President and CEO

September 15, 2006

Mr. Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Re: Advertisement of Membership

Dear Mr. Feldman:

The Independent Community Bankers of America<sup>1</sup> (ICBA) appreciates the opportunity to offer comments on the proposal concerning the Federal Deposit Insurance Corporation's (FDIC) regulation on Advertisement of Membership. The proposal would also standardize the official FDIC sign so that all insured depository institutions will present the same official sign at sites where deposits are made. The proposal would extend already existing advertising requirements for insured banks to savings associations, making the requirements uniform for all FDIC insured depository institutions. Under this proposal, former members of the Bank Insurance Fund and former members of the Savings Association Insurance Fund would eliminate the separate signs that are currently in use and require a new sign that all FDIC insured institutions will use. The new sign would also include the address of the FDIC's official website and clarify that each depositor is insured to "at least \$100,000."

### **ICBA Comments**

ICBA agrees that all FDIC-insured institutions should use the same official sign to lessen confusion among consumers and reflect the merger of the BIF and SAIF into one Deposit Insurance Fund. ICBA agrees with the FDIC on all of the proposed changes to the physical appearance and content of the official FDIC membership sign. ICBA agrees with the clarification regarding the insured amount as it more accurately indicates the coverage limits of the FDIC. ICBA also supports the inclusion of the official FDIC website address on the official sign as it promotes access to information on the FDIC and deposit insurance that may be useful to consumers.

ICBA commends the FDIC's effort to clarify the advertising requirements placed on the institutions it insures. However, we are concerned that replacing several of the specific exceptions to the requirement for the official advertising statement with a

---

<sup>1</sup> Independent Community Bankers of America

requirement to use the statement when either promoting deposit products and services or “generally promoting banking services” may be too vague. To avoid banker confusion, the final rule should clarify that promoting only banking products that are not deposits, such as loans or safe deposit boxes, is not “generally promoting banking services.”

Additionally, the ICBA is concerned that the deadline for compliance is too inflexible in regards to printed advertising and information. ICBA has no objection to a six-month deadline for display of the official sign at teller windows, at bank premises and on bank websites, etc. However, many community banks rely to a significant extent on forms of printed advertising and information, such as brochures and similar materials, to market products and services to customers. A compliance deadline of six months after publication of a final rule might require reprinting of materials before existing stocks of paper advertising and information sources can be exhausted.

ICBA encourages the FDIC to extend the compliance deadline by at least another six months for paper supplies in order to give community banks sufficient time to use existing paper advertising materials to avoid a waste of resources.

Thank you for the opportunity to comment on this proposal. If you have any questions about our comments, please contact the undersigned at (202) 659-8111 or [karen.thomas@icba.org](mailto:karen.thomas@icba.org).

Sincerely,



Karen M. Thomas  
Executive Vice President  
Director, Government Relations Group

