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March 31, 2023

James P. Sheesley
Assistant Executive Secretary
Attention: Comments—RIN 3064—AF26
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429
comments@fdic.gov

Re: Proposal on FDIC Official Sign and Advertising Requirements, False Advertising, Misrepresentation of Insured Status, and Misuse of the FDIC's Name or Logo
Docket No. RIN 3064-AF26

The Kiosk & Display Company, LLC (Kiosk & Display) is a trusted digital signage partner for banks nationwide. We support all our bank partners with meeting FDIC disclosure requirements as defined by the FDIC and governed by each bank's compliance officer.

In August of 2021, we wrote an article called "A New Way to Display FDIC" in which we interviewed our bank customers regarding the American Bankers Association's (ABA) proposal for handling FDIC signage and disclosures listed below.

ABA's 2021 recommendations on this proposal:

- Allow banks to display a single sign in one prominent location per branch and permit electronic displays, such as TV or video monitors, to satisfy multiple disclosure requirements.
- Require FDIC sign or logo only on the homepage or landing page of online or mobile platforms.
- Clarify requirements related to promotional materials and social media use and activities.
- Define the obligations of nonbanks to facilitate consumer understanding of insured or non-insured products and services.
- Increase accessibility and transparency of FDIC tools to help customers differentiate between insured and noninsured institutions.
- Keep changes flexible to allow banks to adjust to the needs of an ever-changing marketplace and its consumers.

After reviewing your current proposal, it's clear the high level of complexity outlined will reduce bankers' ability to comply with the proposed changes successfully, increasing the risk for the public as much as for banks. Jill Bush, who was the second VP for marketing at MidWestOne Bank in 2021, said, "All marketing efforts, including point-of-sale signage, should lead to your website. It's your one source of truth. That's not only efficient, it's safer and smarter."

The complexity of your current proposal is not just a burden on bankers and bank marketing leaders, who are already close to their breaking point in managing new requirements. It would result in an incredibly inconsistent application.

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We all know that consistency is the critical driver for success. It drives accountability, trust, relevance, and reputation. Consistency is also a path to making goals measurable. From that measurement, we can learn and increase success. This is why we propose that the FDIC define a simple, consistent solution that banks can easily implement in any branch configuration so that customers always see the same beacon of communication in any bank or branch across the US.

For example, the FDIC could define that banks provide access to FDIC information for all customers by installing a touchscreen kiosk, or touchpad, dedicated to the bank website in their lobbies. No need for physical branch zones with logos everywhere all at once. Each physical location has one sign on the door and a dedicated digital touchscreen display with a clear purpose attract screen and website access that links every product to the right disclosure. In addition, the FDIC could become a leader in distributing educational messages to consumers by producing captioned videos for display on existing digital signage inside bank lobbies in between marketing messages. All digital media (social, signage, and mobile) can lead with links or QR codes to a bank's "source of truth" website. A solution that can flex with changes over time with technology.

While it is clear that the FDIC is working to do the right thing, we argue that success will come from a solution that is simple, flexible, and consistent.

For a full copy of the 2021 article "A New Way to Display FDIC", please visit: <https://bankingjournal.aba.com/2021/08/a-new-way-to-display-fdic/>

Thank you for your consideration.

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