

From: [Mauriello, Ronald F.](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] RIN 3064-ZA14 FDIC Sign and Advertising - request for comments
Date: Thursday, February 27, 2020 3:07:39 PM
Attachments: [image001.png](#)
[pr20014a.pdf](#)

The following represents my comments to the questions raised in the attached Request for Information. My comments are in **bold**.

1. Should the rule continue to require the sign be a minimum size and a specific color? Is this needed to ensure consumers understand “deposit insurance?” **YES**
2. Should the rule continue to link the placement of the sign to each teller station or window where insured deposits are usually and normally received? **NO. One sign per location should be sufficient.**
3. Should the rule take into account changes in places where deposits are “usually and normally received” by banks? How? **If deposits are accepted at the location then one sign at the location should cover the requirement.**
4. Should the FDIC’s current approach of allowing for permissive or optional placement and use of signage be broadened? How?
5. Does the rule’s definition of “Remote Service Facility” appropriately reflect current banking practices? **YES** For example, should the list of facilities (any automated teller machine, cash dispensing machine, point-of-sale terminal, or other remote electronic facility where deposits are received) be broadened? If so, what other “facilities” should be included?
6. Are FDIC-insured institutions currently displaying a digital representation of the FDIC sign or logo on their websites / mobile apps at account opening? If not, should they do so? **YES, and they should continue to do so.**
7. Are FDIC-insured institutions currently displaying a digital representation of the FDIC sign or logo on their websites / mobile apps each time a consumer deposits funds? If not, should they do so? **Yes, and they should continue to do so.**
8. Are alternative means of displaying an official FDIC sign, beyond a two-dimensional placard, appropriate in places such as cafes and through digital means? How might this be implemented for different delivery channels (*e.g.*, brick-and-mortar, website, app-based)? **YES. Brick and mortar; Café; mobile unit: should allow Bank to display FDIC sign on a display or monitor.**
9. As noted above, the current regulation requires that the official FDIC sign be displayed continuously at each station or window where insured deposits are usually and normally received in the depository institution’s principal place of business and at all of its branches. Should the rule continue to require that the sign be displayed continuously, or should it allow for digital displays or representations that are not continuously displayed? **No need for a display at each station or window. One sign either physical or a display on a monitor should be sufficient per location.**
10. To what extent do the existing rules enable consumers to distinguish between FDIC-insured institutions and uninsured entities? Are there data, surveys, and studies on this issue?
11. Can the regulation be better clarified regarding which types of advertising require the inclusion of the official advertising statement? Should some forms of advertising currently subject to the requirement be made exempt? Are there newer forms of advertising that do not now but should include the official advertising statement?
12. How do banks currently provide the advertising statement when promoting deposit products through non-traditional channels?
13. If a bank is identified in a nonbank’s promotion or advertisement for a deposit product or service, should the advertising statement be required, or conversely, should it be prohibited given that the deposit product or service is from an uninsured entity?
14. Are there examples of potential risks related to misrepresentations involving FDIC deposit insurance coverage that the FDIC should address, including those related to deposit products through use of the internet or other emerging technologies?

15. What changes can be made to the FDIC sign and advertising statement requirements that could deal with preventing misrepresentations regarding FDIC deposit insurance?

16. Are there ways that certain nonbanks should be able to advertise or otherwise represent a legitimate business relationship with an FDIC-insured institution that would be clear to consumers and consistent with the provision on misrepresentation?

17. In allowing the use of their name or mark, should banks be responsible for ensuring the proper use of the FDIC's logo, advertising and representations by nonbanks with whom the banks do business?

18. Do consumers look for the FDIC name or logo when using financial institution websites and apps to confirm the validity of insured institutions' authenticity? Do they look for the logo when deciding to open new deposit accounts? During every interaction?

19. What technological options or other approaches could be utilized to allow consumers to distinguish FDIC-insured banks and savings associations from nonbanks across web and digital channels? What are the benefits and drawbacks of each approach? Is it necessary or desirable for the FDIC to try to "solve" this by rule, or can private sector initiatives better address this issue?

20. If the FDIC develops a technological solution to allow consumers to distinguish FDIC-insured banks and savings associations from nonbanks across web and digital channels, what challenges would institutions have in implementing such solutions? How would any solution work with third parties that have established legitimate business relationships with banks or savings associations?

21. If the FDIC develops a technological solution to allow consumers to distinguish FDIC-insured banks and savings associations from nonbanks across web and digital channels, should its use be limited to FDIC-insured banks, or should third parties that market or facilitate access to deposit products (*e.g.*, prepaid program managers, fintechs) be permitted or required to use such a logo in certain circumstances?

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