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To: Comments
Subject: [EXTERNAL MESSAGE] RIN 3064-ZA14

Hancock Whitney Bank would like to offer comments on this RFI.

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?”

We recommend the signs in bank branches adhere to minimum size for consistency but that institutions continue to have the flexibility to design signs to complement interior design and brand colors.

The signage is not needed to "understand" deposit insurance," but familiarity with the design could reinforce trust.

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?

This is good positioning in the branch, but the need for multiple signs seems like overkill. Another option would be to modernize requirements by allowing branches with digital display screens to instead display via that channel at regular intervals.

3. Should the rule take into account changes in places where deposits are “usually and normally received” by banks? How?

Online and other digital channels should communicate that the institution is a member of FDIC but we recommend the FDIC allow flexibility in how this is displayed. Perhaps in plain text that suits the digital asset versus a logo or "sign".

Customers can now open deposit accounts through online and mobile channels and prominent exposure to the "signage" in some form incorporated in a new channel could be reassuring.

4. Should the FDIC's current approach of allowing for permissive or optional placement and use of signage be broadened? How?

See our responses to 2 & 3, and the approach should be broadened to allow posting of the signage on digital channels within the branch.

5. Does the rule's definition of “Remote Service Facility” appropriately reflect current banking practices? 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?

Straightforward language to reflect online and mobile capture of funds 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 should continue to do so but not be required to use a logo. Simple text that works in the digital space should be acceptable.

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 should continue to do so but not be required to use a logo. Simple text that works in the digital space should be acceptable.

8. Are alternative means of displaying an official FDIC sign, beyond a two-dimensional placard, appropriate in places such as bank “cafes” and through digital means? How might this be implemented for different delivery channels (e.g., brick-and-mortar, website, app-based)?

Not the full sign on ATM and online and mobile - we recommend that the text statement be sufficient.

- Brick and Mortar - one physical sign, digital display
- Mobile unit: Digital display
- ATM: Digital display
- Online and mobile: prominent placement and update language as needed

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?

One physical sign in branch and a regularly-spaced display on a monitor should be sufficient per brick and mortar.

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?

It's confusing to consumers because many times, non-bank entities have legitimate business relationships with banks. For instance, a fintech that provides financial services that include access to an FDIC-insured account at a partner bank. There needs to be special language in that case.

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?

The text form: "Member FDIC" should be included on all advertising where feasible. Rules should allow for small space digital ads and other media to allow the statement in the one-click-away advertisement.

We don't have a problem with including "Member FDIC" on any advertising. Especially in our case in certain markets, where the name of our bank is not well known. It reinforces our existence as a bank.

Consumers could benefit from more clarification with regard to non-FDIC insured , fintech or app based banking. It is our belief that all banking/transactional/financial type of industries should not be exempt.

12. How do banks currently provide the advertising statement when promoting deposit products through non-traditional channels?

In text on advertisements.

Various. Through disclosure.

Member FDIC advertising statement is typically included on ads or, when not feasible, a single click away on non-traditional digital advertising.

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 advertisement is from an uninsured entity?

Not prohibited, but the relationship with the partner bank providing the deposit account should be prominent.

Advertising statement should be required, along with the bank identification. To prohibit would severely limit cooperative partnerships and value add to consumers.

14. 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?

Not familiar with the research, but anecdotally think it must be reassuring. We know that during conversions clients are concerned about FDIC coverage.

It is our opinion that more mature consumers understand the distinction between having their funds at risk versus insured, but perhaps younger clients may not realize the distinction when dealing with many of the fintech.

15. 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?

Option to provide consumers with the ability to do a real-time search or use some automated system of a database of FDIC-Insured institutions. Drawbacks would be client experience - placing ownership on consumers and maintenance and updates of database. It is desirable for the FDIC to put processes or requirements in place to protect consumers and hold financial services accountable.

16. 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?

Some institutions may have resource challenges in implementing the solution, or additional costs if a vendor is tasked with implementing.

For third parties that have legitimate business relationships with banks - the relationship with the partner bank providing the deposit account should be prominent.

Most if not all Federally Insured financial Institutions would not have any challenges with implementation as most already have the required disclosure for consumers in place. It's important that all financial institutions adhere to the same requirements. Third parties would need to disclose their additional affiliations.

17. 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?

We believe prepaid, fintechs, etc. should be required to use logos that allow consumers to discern as to whether or not their funds are insured. That is a major differentiator and would allow consumers to make more informed decisions.

Thanks,
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