



**National Association
of Federal Credit Unions**
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August 7, 2013

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex B)
600 Pennsylvania Ave. NW
Washington, DC 20580

RE: Telemarketing Sales Rule, 16 CFR Part 310, Project No. R411001

Dear Commissioner Ramirez:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association that exclusively represents federal credit unions, I am writing to you regarding the Federal Trade Commission's (FTC) notice for proposed rulemaking and request for public comment on the Telemarketing Sales Rule (TSR). As a preliminary matter, NAFCU and its members appreciate any attempt by the FTC to limit the activities of telemarketers that deceive or take advantage of consumers.

While the TSR amendments do not specifically apply to federal credit unions, it does include state chartered credit unions and third-party telemarketers, whether hired by a federal or state chartered credit union. NAFCU generally supports the FTC's efforts to combat fraud in novel payment methods. NAFCU does have concerns about potential unintended consequences from this rule on payment systems such as remotely created checks, which are covered under the Federal Reserve Board's 2011 Regulation CC proposal that has not yet been finalized.

Many credit unions provide innovative products and services such as mobile check capture and other mobile banking services for their members. While this rule does not directly affect those products, it is essential that the FTC work closely with the Federal Reserve Board of Governors, the Consumer Financial Protection Bureau, and other stakeholders to ensure that there are no negative effects on payments systems.

NAFCU appreciates the opportunity to comment. If you have any questions or concerns, please feel free to contact me by phone at (703) 842-2212 or via email at pjhoffman@nafcu.org.

Sincerely,

PJ Hoffman
Regulatory Affairs Counsel
National Association of Federal Credit Unions