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May 29, 2007

U.S. Securities & Exchange Commission
ATTN: Nancy Morris, Secretary
100 F Street, N.E.
Washington, D.C. 20549-1090

RE: File No. S7-09-07

Dear Ms. Morris:

Great-West Life & Annuity Insurance Company (“Great-West”) appreciates the opportunity to comment on the Interagency Proposal for Model Privacy Form under the Gramm-Leach-Bliley Act.

The model privacy form disclosed in the notice of proposed rulemaking, dated March 20, 2007, does not address certain state Gramm-Leach-Bliley Act (“GLBA”) notice requirements and the proposed format may increase the costs associated with the annual mailing of these notices.

Many financial institutions are obligated to comply with both federal regulations, such as the SEC’s Regulation S-P, and state GLBA regulations, and do so using only one privacy notice. The proposed model privacy form does not, however, include language required by several states describing a consumer’s access and amendment rights. For example, California, Arizona and Montana, among others, require that the GLBA notice include a description of the consumer’s right to access and amend the consumer’s nonpublic personal information.¹ There is also some question whether the model privacy form would comply with California’s requirement that the privacy notice have a Flesch Reading Ease Score of fifty (50)².

Additionally, the proposed model form requires that the notice be printed on a minimum of two (2) separate eight and one half (8.5) by eleven (11) inch pieces of paper. Three (3) pieces would be required if an opportunity to opt-out is offered. This format is likely to increase costs associated with the annual mailing of these notices. Great-West currently uses a folded, one page, self-mailer and while we have not yet obtained an estimate of what the increased costs would be under the proposed model privacy form, we expect an increase not only in postage, but also in material and labor costs.

Thank you again for the opportunity to comment.

Sincerely,

Stacy Knowlton
Lead Counsel & Privacy Officer