

May 29, 2007

Office of the Comptroller of the Currency  
250 E Street, S.W.  
Mail Stop 1-5  
Washington, DC 20219

Re: Docket ID OCC-2007-0003

Mr. Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17th Street, N.W.  
Washington, DC 20429

Re: RIN 3064-AD16

Ms. Mary Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

Re: RIN 3133-AC84

Ms. Nancy M. Morris  
Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090

Re: File Number S7-09-07, Model Privacy Form

Ms. Jennifer Johnson  
Secretary  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue, N.W.  
Washington, DC 20551

Re: Docket No. R-1280

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, N.W.  
Washington, DC 20552  
Attention: OTS-2007-005

Re: Docket ID OTS-2007-0005

Federal Trade Commission  
Office of the Secretary  
Room 135 (Annex C)  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20585

Re: Model Privacy Form, FTC File No. P034815

Ms. Eileen Donovan  
Acting Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, DC 20581

Re: RIN 3038-AC04

RE: Interagency Proposal for Model Privacy Form; 72 Federal Register 14940, March 29, 2007

Dear Sir or Madam:

The undersigned national associations, representing virtually every major financial institution in the U.S., have joined together to emphasize certain of the points made individually in our written comments on the above proposal.

Our associations and our members unanimously support the objectives of the proposed form, because we believe that it is critical for customers to receive clear and concise information about how our member companies protect and use customer information. For that reason, we have been both general and detailed in our comments on the proposal. We believe that addressing the nature of these comments would best call for a reissue of the proposal for further comment after it has been revised to address the issues raised during this comment period, as well as the results of further testing. In a notice program such as that addressed by the proposal, a review of both the parts and the whole together is important to ensure that the information is adequate and balanced.

Our principal concern is that the prescriptive nature of the proposed form would make it impossible for most institutions to explain their privacy policies and practices accurately. Inconsistencies between the proposed form and the provisions of the Fair Credit Reporting Act will confuse and mislead customers. The lack of uniform requirements by different regulators will prevent affiliates in a diversified company from using the same form. Further, we believe that the proposed form will not adequately permit meaningful disclosure and, thus, will expose users to the risk of legal attack under state laws as unfair and deceptive. In addition, inasmuch as the paper size requirements will compel a new, separate mailing, it will impose significant compliance costs. Unless these concerns are addressed fewer institutions will use the form than would be desired. Finally, we strongly believe that, when finalized, the revised model should be a compliance alternative for financial services firms, not a substitute for the model clauses contained in the existing regulation.

Again, we thank the regulators for their persistent efforts in this area to achieve a meaningful and workable disclosure form and look forward to cooperating with you in perfecting the final product. Please do not hesitate to contact any of the undersigned with your additional comments and/or questions.



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Edward L. Yingling  
President & CEO  
American Bankers Association



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Diane Casey Landry  
President & CEO  
America's Community Bankers



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Joe Belew  
President  
Consumer Bankers Association



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Steve Bartlett  
President & CEO  
The Financial Services Roundtable