



March 10, 2014

By e-mail

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: Request for Extension of Comment Period;
Re-Opening of Comment Period for Asset-Backed Securities Release;
Release Nos. 33-9552; 33-9244; File No. S7-08-10

We are pleased that the Commission has re-opened the comment period for the proposed revisions to Regulation AB in Release No. 33-9552 (April 7, 2010) and Release No. 33-9244 (July 26, 2011), to permit comment on an approach for the dissemination of asset-level data. Ford Motor Credit Company LLC respectfully requests a 60-day extension for filing comments.

Our customers are our greatest asset and the protection of their personal information is critically important to us. As presently proposed, we are concerned that asset-level data with specific measures (e.g., of credit scores, metropolitan statistical areas, etc.) as opposed to coded ranges, could be coupled with other publicly available information (e.g., department of motor vehicle registrations) to reveal the identity of our customers and expose sensitive information. As recent events have shown, even with appropriate measures to safeguard customers' personal information, significant risks remain.

Therefore, the approach proposed for asset-level data will require a careful review of the technical and legal aspects of providing this data, including considerations such as the form of disclosure, the repository of the information, the data retention period, defining access rights and appropriate terms of use, determining appropriate legal agreements (confidentiality, indemnification, etc.), assessing potential liability (including the potential for identity theft and fraud), the systems required to comply, and the cost and complexity of maintaining a sustainable process, among others.

In recognition of the risks involved, we believe that the best course of action is to achieve a broad industry consensus on a specific proposal for asset-level data "anonymization" (through use of ranges, groupings, etc.) that retains the utility of information to investors while mitigating risks to retail consumers and issuer liability.

In order to fully assess these considerations and provide an informed response, we respectfully request the Commission to provide a 60-day extension of the comment period for Commission File No. S7-08-10.

We appreciate the opportunity to comment on the proposed approach. Please contact the undersigned at [REDACTED] with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Silverstone". The signature is fluid and cursive, with the first name "B." and the last name "Silverstone" clearly distinguishable.

Bernard Silverstone
Chairman and CEO
Ford Motor Credit Company LLC