



Financial Services

March 25, 2014

Via E-mail

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

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

Volvo Financial Services appreciates the Securities and Exchange Commission's decision on February 25, 2014 to re-open the comment period through March 28, 2014 with respect to the proposed revisions to Regulation AB in Release No. 33-9552 (April 7, 2010) and Release No. 33-9244 (July 26, 2011), to permit comments on an proposed approach for the disclosure of potentially sensitive asset-level data. Volvo Financial Services respectfully requests that the Securities and Exchange Commission extend the deadline for filing comments on the proposed revisions to Regulation AB by sixty (60) days.

The staff memorandum released by the Securities and Exchange Commission with the re-opening of the comment period describes the use of issuer maintained websites as a means to provide asset-level and other confidential offering and reporting information to investors and potential investors. However, since revised Regulation AB has not been released, we do not know the required asset level fields. Based on fields proposed in the Releases, an issuer maintained website creates several significant risks, including (i) that the identity of the underlying borrowers and lessees could be determined using the disclosed asset-level data in combination with other publicly-available information, and (ii) that issuers and potentially investors could be exposed to additional liability arising from website access agreements and misuse of data and breaches of website security. Additionally borrowers and lessees could be exposed to personal damage/loss resulting from a data theft or fraud from a website maintained by an issuer.

These issues are complex and will take some time to evaluate. Volvo Financial Services is an infrequent issuer. While other issuers may already have a secure

technology solution in place to control the transfer of sensitive information to investors as suggested in the staff memorandum we do not. In order for us to respond on an informed basis, after considering the legal, technical, and operational considerations of an issuer website, we respectfully request a sixty (60) day extension of the comment period beyond the current deadline of March 28, 2014.

We appreciate the opportunity to comment on the proposed approach. Please contact the undersigned at (336) 931-3806 with any questions or comments.

Sincerely,



Teresa Davidson
Vice President - Legal & General Counsel
Volvo Financial Services Region the Americas