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**By electronic delivery**

November 7, 2006

Office of the Comptroller of the  
Currency  
Communications Division  
Public Information Room  
Mailstop 1-5  
Attention: 1557-NEW  
250 E Street, SW.  
Washington, DC 20219  
[regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov)

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal  
Reserve System  
20th Street and Constitution Avenue,  
NW.  
Washington, DC 20551  
[regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

Robert E. Feldman  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance  
Corporation  
550 17th Street, NW.  
Washington, DC 20429  
[Comments@FDIC.gov](mailto:Comments@FDIC.gov)

Information Collection  
Comments, Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW.  
Washington, DC 20552  
Attention: "Survey of Information  
Sharing Practices with Affiliates (1550-  
NEW)."  
[infocollection.comments@ots.treas.gov](mailto:infocollection.comments@ots.treas.gov)

Federal Trade Commission  
Office of the Secretary  
Room H-135 (Annex J)  
600 Pennsylvania Avenue, NW.  
Washington, DC 20580  
"Affiliate Sharing Study: FTC File  
No. P064802"  
[affiliatestudy@ftc.gov](mailto:affiliatestudy@ftc.gov)

Neil McNamara  
Deputy Chief Information Officer  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428  
[regcomments@ncua.gov](mailto:regcomments@ncua.gov)

Survey of Information Sharing Practices with Affiliates  
71 *Federal Register* 51888, 31 August 2006

Ladies and Gentlemen:

The American Bankers Association ("ABA") is pleased to submit our comments on the draft "Survey of Information Sharing Practices with Affiliates" ("survey") proposed by the Office of the Comptroller of the Currency, Department of the Treasury, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the

