



Ford Motor Credit Company  
Legal Office  
1 American Road  
Dearborn, Michigan, 48126

March 29, 2004

Federal Trade Commission  
Office of the Secretary, Room 159-H  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

via: [GLBnotices@ftc.gov](mailto:GLBnotices@ftc.gov)

Re: Alternative Forms of Privacy Notices, Project No. P034815

Dear Sir or Madam:

Ford Motor Credit Company is a subsidiary of Ford Motor Company and one of the country's largest providers of indirect motor vehicle financing. Ford Credit welcomes this opportunity to provide comments in response to the Advanced Notice of Proposed Rulemaking and commends the Federal Trade Commission and the other federal regulators for this effort.

We believe there is merit to an examination and possible development of a short form privacy notice. Privacy notices issued pursuant to the Gramm-Leach-Bliley Act and the Privacy Rule have engendered much debate. In our view it is beneficial to reexamine the structure and content of present notices and assess whether or not they are achieving the desired goal of presenting clear and concise information meaningful and useful to customers.

We believe there are opportunities to simplify or even reduce required content while making the remaining information more meaningful and easier to understand. Notices today contain a wide variety of content. Each covered entity arranges the required content in different ways. While flexibility should be maintained, especially in light of the diverse entities covered by the FTC's Privacy Rule, a goal of any short notice effort should be the delivery of clear, concise and meaningful information presented in a meaningful fashion, useful to the customer in the customer's decision-making. This is a case where "less" may in fact be "more". By creating standardized short form notice

format and/or content each notice builds upon another, even when they are from different institution or different lines of business. The repetition itself will lead to a growing familiarity about notices that will help customers better understand each notice they receive. There is also the benefit from the cumulative effect of having similar information presented in similar reoccurring formats leading to more meaningful information, more actionable information, more ability to compare, more control over choices, less confusion and fewer burdens.

Achieving a short form notice requires more than just a review of the Privacy Rule. There is a need to consider FACT in achieving a simplified privacy notice regime. A revision of GLBA privacy notices without fully incorporating the impact of the yet to be issued regulations for affiliate sharing under FACT would detract from and could even undermine the effort of achieving a simplified short form notice. Proceeding first with FACT regulations then to the short form may be beneficial to an overall process.

Another significant factor is the interplay between federal and state privacy notice requirements. There is little likelihood for success for a meaningful, simplified, uniform notice regime if each state may require its own state-specific disclosures that are different from those required under a federal privacy notice requirement. Achieving short form notices will require addressing and resolving this difficult issue.

We believe the effort to produce a short notice has potential for customers and businesses alike. We welcome the opportunity to participate as this effort progresses.

Keith A. Cheresko  
Counsel - Privacy