

Federal Agencies' Joint Request for Comment: Alternative Forms of Privacy Notices

March 26, 2004

Comments Submitted by:

Privacy Rights Clearinghouse
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Sent via e-mail to:

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Attn: Docket No. 03-27

**RE: Interagency Proposal to Consider Alternative Forms of Privacy Notices under the
Gramm-Leach-Bliley (GLB) Act (FTC RIN3084-AA94, Project No. 034815)**

<http://www.ftc.gov/os/2003/12/031223anprfinalglbnotices.pdf>

- A. Introduction**
- B. About the Commenting Organizations**
- C. Continued Consumer Interest in Financial Privacy**
- D. Agency Approach to Short-form Notice**
- E. Goals of a Privacy Notice**
- F. Elements of a Privacy Notice**
- G. Language of a Privacy Notice**
- H. Format of a Privacy Notice**
- I. Mandatory or Permissible Aspects of a Privacy Notice**
- J. Costs and Benefits of a Short Notice**
- K. Additional Information – Consumer Testing and Education**
- L. Conclusions and List of Individuals Who Have Signed on to These Comments**
- Attachment A. Sample Short Form Notice from 2002 California Legislative Session for
SB 773 (California State Senator Jackie Speier)**
- Attachment B. Privacy Notice Stipulated in California Senate Bill 1 (California State
Senator Jackie Speier, 2003)**

The Privacy Rights Clearinghouse, Consumers Union, Consumer Action, Identity Theft Resource Center, the World Privacy Forum, and PrivacyActivism submit these comments on the advanced notice of proposed rulemaking (ANPR) published jointly by the Office of Comptroller of Currency (OCC), Board of Governors of the Federal Reserve (Board), Office of Thrift Supervision (OTS), Federal Deposit Insurance Corporation (FDIC), Federal Trade Commission (FTC), Securities and Exchange Commission (SEC), and the Commodity Futures Trade Commission (CFTC) (the Agencies). (68 FR 75164, December 30, 2003)

Because the ANPR indicates the Agencies will jointly review all submissions, these comments are directed to the FTC under that agency's project number. The organizations understand these comments will be shared among all the Agencies participating in the ANPR.

