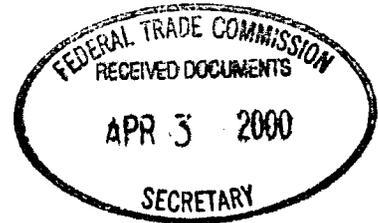




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March 31, 2000

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

RE: Gramm-Leach-Bliley Act Privacy Rule, 16 CFR 313 – Comment

Dear Sirs and Madams:

Please consider this letter our response to the Commission's request for comments on the proposed privacy regulation ("Proposed Rule"), authorized and required under Title V of the Gramm-Leach-Bliley Act (the G-L-B Act). PRIMUS Financial Services appreciates the opportunity to comment on this Proposed Rule.

PRIMUS Financial Services, a division of Ford Motor Credit Company ("Ford Credit"), engages in both wholesale and retail motor vehicle financing. Besides the PRIMUS label, we also conduct business under various private label agreements and assumed names. These entities include Jaguar Credit, Mazda American Credit, Subaru American Credit, Kia Financial Services, American Suzuki Automotive Credit, Charter Financial of Massachusetts, Citizens Auto Lease, FOA Acceptance, FOA Leasing, Lendco Leasing, Lendco Credit, First General Leasing, Foundation Financial, AmSouth Dealer Financial Services, Old Kent Dealer Services, and Superior Automotive Financial. Currently, PRIMUS Financial Services manages over \$14.5 billion in assets.

PRIMUS Financial Services fully supports and agrees with the comments presented in a letter dated March 31, 2000, from David L. Korman, Vice President General Counsel of Ford Credit. We respectfully request that the Commission carefully consider the emphasis Mr. Korman's comments place on following the actual text of the G-L-B Act. In addition, due to the serious potential impact on our operation we strongly support a phase-in date of August 12, 2001.

Again, we appreciate the opportunity to respond.

Sincerely,

**Rene Ramirez**  
Vice President and General Counsel  
PRIMUS Financial Services  
P.O. Box 680100  
Franklin, TN 37068-0100