

By Electronic Mail

October 21, 2016

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

Re: Safeguards Rule, 16 CFR 314, Project No. P145407; Request for Extension of Time to File Comments

Dear Mr. Clark:

The Federal Trade Commission (“FTC”) has recently published Federal Register Notices requesting public comment on potential revisions to its Safeguards Rule and its Disposal Rule. Comments on the Safeguards Rule are due November 7, and comments on the Disposal Rule are due November 21.

The undersigned trade associations request that the FTC extend the deadline for public comment on the Safeguards Rule until November 21, so that comments on both Federal Register Notices can be filed at the same time.

The two rules are closely related to one another. In fact, the banking agencies have incorporated their version of the Disposal Rule into their version of the Safeguards Rule. In addition, other state and federal data security requirements that may conflict with the rules address both safeguarding and disposal of sensitive data. Moreover, comments on each of the rules are likely to overlap, such as, comments addressing the interaction between the two rules or the incorporation of existing data security standards into the two rules.

Sincerely,

American Financial Services Association
Consumer Data Industry Association
National Auto Dealers Association

cc: Manesha Mithal
Tiffany George
David Lincicum
Katherine McCarron