



29

December 4, 2000

Manager, Dissemination Branch
Information Management and Services Division
Office of Thrift Supervision
1700 G Street, N.W.
Washington, DC 20552

Dear Sir or Madam:

Thank you for the opportunity to comment on the proposed rulemaking regarding the Fair Credit Reporting Act (FCRA). As a member of the Principal Financial Group, a large and diversified financial services company, we believe the proposed rule will significantly impact companies such as ours.

The proposed rule does not define 'transaction or experience information' directly. However, the definition of 'opt out information' specifies information which may be shared among affiliates only after providing the customer the opportunity to opt out of this sharing. The proposed rule appears to place restrictions on information sharing among affiliates, as it applies to banks, above and beyond that of the privacy provisions of the Gramm-Leach-Bliley Act (GLBA). The GLBA requires providing customers the opportunity to opt out of information sharing with unaffiliated third parties. The definition of opt out information in the proposed FCRA includes 'application information. This definition is so inclusive as to effectively require banks to provide this opt out in order to share any meaningful information with affiliates.

This apparent conflict between the proposed FCRA and GLBA has the potential to result in significant confusion on the part of customers of diversified financial services companies. Principal Bank has many customers who are also customers of one or more Principal Financial Group affiliates. Under the proposed FCRA, a Principal Bank customer could opt out of sharing of bank information with other affiliates. However, another Principal affiliate could share customer information (as provided by GLBA) without this opt out requirement. This scenario would likely result in confusion on the part of a customer who opted out of sharing at the bank level, but receives a solicitation from a Principal affiliate based on information provided by a non-bank affiliate.

The differences between the proposed FCRA and GLBA information sharing provisions would create additional recordkeeping and administrative costs for banks. The Principal Financial Group is presently developing a uniform GLBA privacy policy and notice. Principal Bank would need to develop a separate privacy policy and notice under the additional opt out requirements for information sharing among affiliates in the proposed

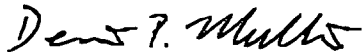


FCRA. In addition, the Bank would need to develop a separate opt out tracking system infrastructure from that of the Principal Financial Group.

In conclusion, we believe the definition of opt out information is so expansive as to preclude any meaningful information sharing of bank information with non-bank affiliates. This would appear to conflict with the privacy provisions of GLBA, and has the potential to create confusion on the part of customers of diversified financial services companies. In addition, banks could be faced with additional systems and administrative costs as a result of this apparent conflict.

Thank you again for the opportunity to comment on the proposed rule. Please call me at 515-247-0994, or e-mail at mullin.dennis@principal.com.

Sincerely,



Dennis P. Mullin

Vice President/Chief Compliance Officer