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March 27, 2002

Regulations and Legislation Division
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.
Washington, DC 20552

ATTN: Study on GLBA Information Sharing

We recommend that the federal banking agencies expedite the issuance of the final Fair Credit Reporting Act (FCRA) regulations that were issued in proposed form in October of 2000. We recommend that the regulations include detailed guidance as to what does, and does not, constitute "transaction or experience" information that may be shared by affiliates without having to provide customers with the right to opt out of such sharing, and that the regulations make clear that minimal identifying information (e.g., name, address, social security number and telephone number) constitutes "transaction or experience" information that may be so shared. We further recommend that the regulations provide detailed guidance on the sharing of customer information by affiliates for the *centralized* provision of services, such as when a holding company or one of its banking subsidiaries receives customer information from other subsidiaries for the purpose of providing services to those other subsidiaries, such as loan underwriting, processing, closing and collection, quality control, deposit account administration, and similar purposes.

Sincerely,

A handwritten signature in cursive script that reads 'R. Murphy'.

Robert N. Murphy
Vice President/Compliance Officer