



March 22, 2004

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue, NW, Room 159-H
Washington, DC 50580

RE: Alternative Forms of Privacy Notices, Project No. P034815

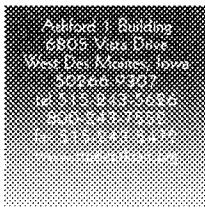
To Whom It May Concern:

This letter is submitted on behalf of Iowa Student Loan Liquidity Corporation (Iowa Student Loan) in response to the Notice of Proposed Rule Making (NPRM) on the "Interagency Proposal to Consider Alternative Forms of Privacy Notices Under the Gramm-Leach-Bliley Act" (GLB Act). We thank the Federal Trade Commission for the opportunity to comment on these proposed rules.

Iowa Student Loan is a secondary market for the Federal Family Education Loan Program (FFELP), a servicer for FFELP participants and an originator and servicer of alternative education loans. This letter focuses on the proposed rules as it affects the FFELP and alternative student loan programs and disclosure of information to our customers.

GENERAL COMMENTS

Iowa Student Loan applauds the Interagencies for recognizing the need for a review of the regulations that implement sections 502 and 503 of the GLB Act, which allow or require financial institutions to provide alternative types of privacy notices, such as a short privacy notice, that would be easier for consumers to understand is needed. During our analysis of the proposed amendments, it was helpful to review the questions that your group proposed, and these answers enabled us to provide you with a concise group of comments.



Goals of a Privacy Notice

Iowa Student Loan feels the main goal of the privacy notice is to inform the consumer that information is shared with affiliates and non-affiliates. The notices should be easy to read and to the point. Many notices are longer than one page and lose the readers attention. We feel it is important for the customer to understand what information is being shared, with whom, and the reason for the sharing.

We do not feel the customer will compare different institutions' privacy policies. It was the opinion of our group that the privacy policy of any one institution will not make it a more or less desirable institution to do business with.

Elements of a Privacy Notice

The importance of the opt-out provisions should be left to the institution. The Higher Education Act of 1965, as amended, outlines the requirement of sharing customer information necessary to process and approve loan applications, disburse the loan proceeds and to continue to service the loans through a successful repayment period; thus, the opt-out section of the GLB Act is not applicable in our industry.

After reviewing all of the Appendices, our group felt the standardized format in Appendix C would fulfill all of the requirements of the rule. It would give the institution the ability to personalize their notice, but retain all the elements required. By including the Important Information section, the institution could include any state requirements it might have to disclose.

Formatting of a Privacy Notice

We believe that, within reason, the format and overall design should be left to the individual user. Regulation P contains language dictating that the document must be "reasonably understandable and designed to call attention to the nature and significance of the information." Once the notice is deemed to be "clear and conspicuous," the individual printing and mailing equipment may dictate how the document can be formatted.

Mandatory or Permissible Aspects of a Privacy Notice

Iowa Student Loan feels the institution should be permitted to create its own short notice following agency guidelines. It would be helpful if the Agencies would create some standardized language in the notice that would create a safe harbor from administrative enforcement if the institution chose to use them.

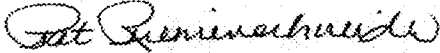
For those institutions that do not allow customers to opt-out of information sharing under the FCRA or GLB Act and do not engage in joint marketing agreements, it seems reasonable to allow them to continue to use their abbreviated and simple notices.

Effective Date/Implementation Date

Although there were no compliance dates in the NPRM, we propose that such dates allow companies enough time to implement changes to their systems and printing specifications, if needed.

Thank you again for the opportunity to comment. If you have any questions regarding the comments or need further clarification, please contact Pat Riemenschneider at (515) 243-5626 ext 433.

Sincerely,

A handwritten signature in cursive script that reads "Pat Riemenschneider". The signature is written in black ink and is positioned above the printed name.

Pat Riemenschneider
Sr. Program Policy Analyst