

Summary of Presentation by National Retail Federation
GLB Interagency Meeting on the ANPR on Privacy Notices
February 18, 2004
Federal Trade Commission Conference Center

Participant:

Mallory Duncan, Senior Vice President and General Counsel
Elizabeth Treanor, Senior Director and Government Relations Counsel

Comments:

Mr. Duncan stated that there is a lot less enthusiasm for short notices than there was three years ago. First, companies are more familiar with the Gramm-Leach-Bliley Act process, and they have greater comfort with the legal certainty of that notice.

Second, retailers have become aware of how different their operations are from other companies. For example, retail companies have third party licensed departments that are not affiliated and handle specialty items such as jewelry, cosmetics, hair salons, photos, rugs, and furniture, inside the stores.

Third, some companies have begun to shorten and simplify their policies.

Mr. Duncan said that the sample in Appendix C is closest to the approach the retail industry supports. Regarding standardized language, he said they may accept a proposal that provides an easier way to explain the privacy provisions. He added that retailers like the term "family of companies."