



JOHNSON
FINANCIAL GROUP.

May 14th, 2007

Jennifer J. Johnson
Secretary, Board of Governors
Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, D.C. 20551

Re: Model Privacy Form
FRB Docket No. R-1280

Dear Secretary Johnson:

Johnson Financial Group is a \$4.3-billion financial holding company headquartered in Racine, Wisconsin, operating through a number of affiliated companies primarily in the states of Wisconsin and Arizona. Our product/service lines include banking, trust and investment services (Johnson Bank), an insurance agency (Johnson Insurance Services, LLC), and branded brokerage and charge card services (with joint marketing partners).

Johnson Financial Group recognizes the effort of the regulatory agencies for their work in attempting to facilitate a dialogue and create a template privacy disclosure. While such efforts have the goal of advancing the ability of consumers to understand the information sharing practices of a financial institution and to compare privacy practices among financial institutions, we have significant concerns about the resultant product and the requirements put forth in this proposal.

It is our belief that consumers are already inundated with disclosures and other information. While a consistent look is an admirable goal, expanding the disclosure to a 3-page, one-sided, document will not result in providing more meaningful information. The longer the document, the less likely the consumer is to read it upon receipt. Assuming this to be true, the only reason for the consumer to retain it is for future reference. If/when the consumer returns to it for reference or review; formatting, font, and other proposed restrictions will not be germane to his/her objectives.

We had hoped that this proposal would move away from paper-oriented standards at a time when current trends are moving towards an electronic world. Numerous questions remain as to how a bank could control compliance with minimum font-size standards, number of pages, etc., when dealing with a multitude of electronic delivery systems. For example:

- Will the regulation require a minimum font size on a bank's Internet site?
- How will the bank be able to control the font size created at the time a customer reads and/or prints the disclosures from a home computer (knowing that the appearance and size of material displayed on a computer monitor is determined by the computer user)?
- How will the document appear when viewed on a hand-held device (which is becoming a very popular method to receive information)?

Johnson Financial Group believes that setting minimum font size standards, including only being allowed to use on side of the paper stock, for disclosures is a materially flawed concept and believes it should be completely removed from this proposal.

In addition to the aforementioned concerns about required document formatting, we have even greater concerns about the opt-out form on page three. The construction of the proposed form unjustly steers the customer to opt-out. This is not the philosophy of Johnson Financial Group. As a full service financial services company, our niche with consumers is our ability to provide *comprehensive* financial solutions to their needs, not steer them away from them. As currently proposed, the disclosure format will limit our ability to service our clients.

Finally, in the proposal, the Agencies are specifically asking for comment on the extent to which financial institutions are likely to use the proposed model form. It is the belief of Johnson Financial Group, that it would not be in the best interest of our company or our clients to use the model privacy form in its current format. While we strongly support the desire to make the form easier for consumers to read and understand, this must be balanced against a desire on the part of banks to not be subject to additional unnecessary regulatory burden and its associated costs. The potential benefit of the limited safe harbor clearly does not warrant or justify adopting the model disclosure in its present form.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

John R. Topczewski
Vice-President/Corporate Compliance Officer

cc: Richard A. Hansen, President and CEO, Johnson Financial Group
Kurt Bauer, Executive VP, Wisconsin Banker's Association