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Via E-Mail (secretary@cftc.gov)

Ms. Jean A. Webb

Secretary

Commodity Futures Trading Commission

Three Lafayette Centre

1155 21st Street., N.W.

Washington, D.C. 20581

COMMENT

Re: Alternative Forms of Privacy Notices

Dear Ms. Webb:

As a self-regulatory organization for the futures industry, National Futures Association (NFA) is committed, first and foremost, to protecting investors and, second, to minimizing the burdens that regulation places on the futures industry. We appreciate the opportunity to comment on the Interagency Proposal to Consider Alternative Forms of Privacy Notices Under the Gramm-Leach-Bliley Act, 68 Fed. Reg. 249 (December 30, 2003), which shows the Agencies' commitment to these same principles.

In our experience, customers are more likely to read short documents written in plain English. Therefore, we support the Agencies' initiatives to encourage the use of shorter, more customer friendly privacy notices. Different types of financial institutions collect different information, however, and even firms within the same industry category have varying disclosure policies. For this reason, NFA prefers the approach taken in Appendix C, which provides firms with the most flexibility in tailoring the notice to their privacy policies and practices without dictating particular language.

We do not believe the Agencies should mandate the use of a particular format. Firms should not have to incur additional expenses to change or supplement privacy notices that meet the statutory requirements. The Agencies should, however, consider providing a safe harbor for those firms that choose to use an alternative format approved by the Agencies.

If you have any questions concerning this letter, please contact me at 312-781-1413 or ts Sexton@nfa.futures.org.

Respectfully submitted,

Thomas W. Sexton

Vice President and General Counsel

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