



*MBNA America Bank, N.A.
1100 North King Street
Wilmington, Delaware 19884-0127*

August 16, 2004

Federal Trade Commission
Office of the Secretary
Room H-159 (Annex S)
600 Pennsylvania Avenue
Washington, DC 20580

Re: FACT Act – Summaries of Rights; Notices of Duties, Matter No. R411013

Ladies and Gentlemen:

This letter is submitted on behalf of MBNA America Bank, N.A. (“MBNA”) in response to the Commission’s request for public comment, published in the July 16, 2004 Federal Register, on two summaries of rights and two notices of duties under the Fair Credit Reporting Act (“FCRA”). The proposed summaries of rights include: (1) a summary of rights of identity theft victims required by section 609(d) of the FCRA; and (2) a general summary of consumer rights under the FCRA. The proposed notices of duties include: (1) a notice of responsibilities under the FCRA of persons that furnish information to consumer reporting agencies; and (2) a notice of responsibilities under the FCRA of persons that obtain consumer reports from consumer reporting agencies. MBNA appreciates the opportunity to comment on this matter.

MBNA is a member of the Coalition to Implement the FACT ACT (the “Coalition”), which is submitting comments to the Commission on this matter. MBNA endorses the Coalition’s comments, a copy of which is attached.

If you have any questions concerning these comments, or if we may otherwise be of assistance in connection with this matter, please do not hesitate to contact the undersigned.

Sincerely,

MBNA America Bank, N.A.
/s/Joseph R. Crouse
Joseph R. Crouse
Legislative Counsel
(302) 432-0716

Enclosure