

Federal Reserve Board

Federal Deposit Insurance Corporation

National Credit Union Administration

May 25, 2001

Interpretive Letter #910

June 2001

15 USC 6000 (b) (2) (A)

15 USC 6004 (b) (3) (A)

15 USC 6004 (b) (3) (B)

15 USC 6004 (b) (3) (C)

15 USC 6004 (b) (3) (D)

15 USC 6004 (b) (3) (E)

15 USC 6004 (b) (3) (F)

15 USC 6004 (b) (3) (G)

15 USC 6004 (b) (3) (H)

15 USC 6004 (b) (3) (I)

15 USC 6004 (b) (3) (J)

15 USC 6004 (b) (3) (K)

15 USC 6004 (b) (3) (L)

15 USC 6004 (b) (3) (M)

15 USC 6004 (b) (3) (N)

15 USC 6004 (b) (3) (O)

15 USC 6004 (b) (3) (P)

15 USC 6004 (b) (3) (Q)

15 USC 6004 (b) (3) (R)

15 USC 6004 (b) (3) (S)

15 USC 6004 (b) (3) (T)

15 USC 6004 (b) (3) (U)

15 USC 6004 (b) (3) (V)

15 USC 6004 (b) (3) (W)

15 USC 6004 (b) (3) (X)

15 USC 6004 (b) (3) (Y)

15 USC 6004 (b) (3) (Z)

15 USC 6004 (b) (3) (AA)

15 USC 6004 (b) (3) (AB)

15 USC 6004 (b) (3) (AC)

15 USC 6004 (b) (3) (AD)

15 USC 6004 (b) (3) (AE)

15 USC 6004 (b) (3) (AF)

15 USC 6004 (b) (3) (AG)

15 USC 6004 (b) (3) (AH)

15 USC 6004 (b) (3) (AI)

15 USC 6004 (b) (3) (AJ)

Section 502(d) of the Gramm-Leach-Bliley Act provides that a "financial institution shall not disclose, other than to a consumer reporting agency, an

account number or similar form of access number or account identifier, or any other information that would allow access to a consumer's account, to a third party, unless the consumer has authorized the disclosure in writing or the disclosure is otherwise permitted by law. The statute also provides that a financial institution shall not disclose, other than to a consumer reporting agency, an account number or similar form of access number or account identifier, or any other information that would allow access to a consumer's account, to a third party, unless the consumer has authorized the disclosure in writing or the disclosure is otherwise permitted by law.

When a marketer seeks access to a customer's account number to allow the marketer to initiate a charge to the customer's account or to provide a service to the customer, the marketer must first obtain the customer's consent. The statute also provides that a financial institution shall not disclose, other than to a consumer reporting agency, an account number or similar form of access number or account identifier, or any other information that would allow access to a consumer's account, to a third party, unless the consumer has authorized the disclosure in writing or the disclosure is otherwise permitted by law.

5162, 35181 (June 1, 2000); *see also* 65 Fed. Reg. 31722, 31733  
(NCUA).

65 Fed. Reg. 31722, 31733  
(May 18, 2000).

Sincerely,

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-signed-

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William F. Kroener, III

William A. Virgil, Managing

William