



August 15, 2008

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

Re: Fair and Accurate Credit Transaction Act (FACT Act) Risk-Based Pricing  
Rule – FRB Docket No. R-1316

Dear Secretary Johnson:

Johnson Financial Group, Inc. is a \$5.2-billion financial holding company headquartered in Racine, Wisconsin, operating through several 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 credit card services (with joint marketing partners).

We appreciate and support the Boards' efforts to provide meaningful information to consumers so they can make educated decision in regard to their financing needs. As consumers are already inundated with a vast amount of paperwork when applying for credit, we are pleased to see the Board recognizes an opportunity to provide consumers with meaningful information in a single disclosure. We support the credit score disclosure exceptions as a means of communicating the requirements of the FACT Act Risk-Based Pricing Rule.

The obstacle of determining on a case-by-case basis, "whether a consumer has received material terms that are materially less favorable terms than other consumers have received", would not be operationally feasible; nor are the two alternative methods. Therefore, the proposed exceptions to provide a credit score disclosure in place of the risk-based pricing notice is a better alternative for both our bank and our clients.

In addition, the proposed model notices contain the desired information to facilitate compliance with the regulation and provide reasonable information that a consumer can comprehend. We also support the flexibility of modifying the proposed notices to deliver a consistent and meaningful notice to our clients, without losing the safe harbor provision so long as such modification does not materially affect the substance of the notice.

Again, we urge the Board to proceed with the rulemaking and incorporate the proposed credit score disclosure exceptions within the final rules, which provide a practical and cost-effective solution to the requirements imposed by the FACT Act.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Topczewski", with a long horizontal line 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