



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 N)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: FACT Act - Credit/Insurance Scores Study, Matter No. P044804

Ladies and Gentlemen:

This letter is submitted on behalf of MBNA America Bank, N.A. ("MBNA") in response to the Commission's notice and request for comment ("Notice") published in the Federal Register on June 18, 2004. The notice requests public comment to aid the Commission in a study of the effects of credit scores and credit-based insurance scores on the price and availability of various financial products, including credit cards, and whether the utilization of these tools result in any form of discriminatory impact.

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 are 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,

/s/Joseph R. Crouse
Joseph R. Crouse
Legislative Counsel
(302) 432-0716

Enclosure