

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

July 16, 2004

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

Re: FACT Act Section 318(a)(2)(C) Study - Matter No. P044804

Ladies and Gentleman:

This letter is submitted on behalf of MBNA America Bank, N.A. ("MBNA") in response to the Commission's notice and request for public comment on preparing a proposed study of the effects of a requirement that a consumer who has experienced an adverse action based on a credit report receive a copy of the same credit report the creditor relied on in taking the adverse action.

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 participated in the preparation of, and fully endorses, the Coalition's comments.

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.

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