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I fully support your efforts to craft legislation regarding the proper disposal of confidential information. I have read the published draft, & provide the following comments which I hope will be helpful:

- 1) While I do understand the constraints of this proposal to be the disposal of consumer report information, I was disappointed that it didn't go further, since payroll records, credit card receipts, etc., are routinely discarded by many businesses with insufficient care exercised over confidential disposal.
- 2) It is critical that the legislation have strict rules without loopholes allowing them to be weakened
- 3) The costs associated with effective disposal are minimal. The document destruction industry has developed cost effective ways for this to be accomplished. For example, in most markets 300 lb. of paper can be shredded for less than \$50, and many small business contractors are set up to collect and shred these documents at the customers location to minimize inconvenience. No business can claim that effective disposal of documents represents a prohibitive expense.
- 4) My company is in the business of providing on site document destruction services, and has hundreds of responsible small business clients who find the modest fees no burden to effective document disposal.
- 5) The place to stop records being disposed of carelessly is at the point of disposal, and must be the responsibility of the disposing party. Assuming that garbage being buried, or paper being baled at a recycler, provides sufficient security is clearly not enough, as anyone who has visited garbage dumps or recyclers premises would know.
- 6) Dumpster diving is a legal activity in Indiana, and I have spoken to people who openly boast about the value of this to obtain business intelligence. Criminals stealing identity information must find it equally easy & profitable
- 7) As a final comment, identity theft represents a considerable burden to those affected, while the cost to eliminate by proper document destruction methods is a modest one. We need strong and complete legislation covering the broadest range possible of consumer information

Thank you for giving me the opportunity to comment on this important rule.

Stan Bond