

**UNITED STATES OF AMERICA
Before the Federal Trade Commission**

**In the Matter of
The FACT Act Disposal Rule, R-411007**

**COMMENTS OF ARMA INTERNATIONAL
*The Association for Information Management Professionals***

I. About ARMA International and the Role of Information Management.

ARMA International (ARMA) is the non-profit membership organization for the world's information management profession. The 10,000 members of ARMA include records and information managers, imaging specialists, archivists, hospital administrators, legal administrators, librarians, and educators.

Information is among the most valuable assets of any organization. In the case of organizations that possess, process and use sensitive consumer information, this information is a part of the organization's strategic business strategy. As such, these organizations have significant responsibility to manage and maintain the integrity of this information, including the implementation of appropriate safeguards against unauthorized use and the proper disposal of the information. Safeguards and proper disposal are essential elements of an organization's information retention and disposition program. An organization's retention and disposition program for records of information, in the instance of this proposed rule, consumer information, is informed by policies and procedures developed, implemented and audited by the organization to ensure compliance and credibility in its stewardship of sensitive personally identifiable information.

As a recognized standard developer for the American National Standards Institute (ANSI), ARMA has submitted for public comment "Managing Recorded Information Assets and Resources: Retention and Disposition Program" (hereafter "the Draft Standard"). These are submitted as a part of ARMA's comments by reference to the ARMA web page. See <http://www.arma.org/standards/documents/RetentionDispositionGuidelinePublicReview0504.pdf>.

While the Draft Standard is still open for public comment and has not completed the formal ANSI standards development process, it represents long recognized best practices for the retention and disposition of information in the custody of organizations.

The Draft Standard in part updates an earlier ARMA publication, entitled "Developing and Operating a Records Retention Program – A Guide" (hereafter "ARMA 1986 Guide"), developed under ARMA's standards making process. For excerpts of this document, see "Guidelines for Retention by Industry Program (GRIP)" at www.arma.org/membership/isg/grip. For example, the Draft Standard incorporates

