

# Boggs, Kramer & Associates

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Secretary  
Federal Trade Commission  
Room H-159  
600 Pennsylvania Avenue, N.W.  
Washington D.C. 20580



RE: Gramm-Leach-Bliley Act Privacy Rule

I am writing to express my concern with the proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999. As a licensed private investigator and a small business person, I fear we would lose valuable and very necessary source of locating witnesses and suspects if "non-public personal information" is defined to include simple names and addresses of customers of financial institutions.

It was my impression that the clear intent of Congress was to provide an opportunity for customers of financial institutions to "opt-out" of sharing three personal financial information with non-affiliates of the institutions. The statute provides protection for financial information--not mere names and addresses. If all information available to a financial institution is defined as "non-public personal information," then what is "public"? Congress seems to be offering a distinction by describing financial information. I believe the Act provides opt-out of information regarding credit history, employment and financial assets. But name, address, and phone number should not be classified as "non-public."

Private investigators play an important role in our civil and criminal justice systems which is not understood by many. The information we obtain regarding addresses and phone numbers is essential to our conduct of business and fulfilling our obligations to customers. We utilize this information to investigate embezzlement, insurance fraud, locate delinquent child support debtors and serve process among other things. Stalkers and scam artists seldom reside where their vehicles are registered so current address information is essential and law enforcement seldom has the manpower to develop these cases for prosecution.

If this information is deemed "non-public personal," only wrongdoers and criminals will benefit and the law-abiding consumer will be the loser. I urge you to define non-public personal information in the manner that Congress intended.

Sincerely

A handwritten signature in cursive script that reads "Larry E. Boggs".

Larry E. Boggs