

R.J. FRASCO
A G E N C Y

R.J. FRASCO AGENCY, INC.

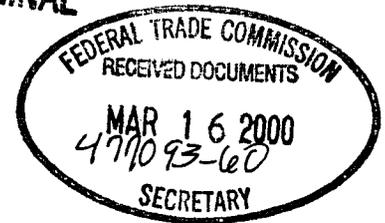
AN INVESTIGATION CORPORATION

7677 Oakport St., Suite 565
Oakland, CA 94621
Tel: (510) 562-2587
Fax: (510) 562-2889

March 13, 2000

Secretary
Federal Trade Commission
Room H-159, 600 Pennsylvania Ave., N.W.
Washington, D.C. 20580
RE: Gramm-Leach-Bliley Act Privacy Rule, 16 CFR Part 313- Comment

ORIGINAL



To Whom It May Concern:

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 small business person, I fear we will lose a valuable and very necessary source for 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 their 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 seemed 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. The information we obtain regarding addresses and phone numbers is essential to our conduct of business and fulfilling our obligations to consumers. 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 matter that Congress intended.

Very truly yours,
FRASCO INVESTIGATIVE SERVICES


George Cramer, CFE, CPI
Vice President

215 West Alameda Ave., Suite 203 • Burbank, CA 91502 • (818) 848-3888
300 Esplanade, Suite 570 • Oxnard, CA 93030 • (805) 981-8330
500 North State College Blvd., Suite 150 • Orange, CA 92868 • (714) 938-1502
7677 Oakport St., Suite 565 • Oakland, CA 94621 • (510) 562-2587

1665 W. Shaw Ave., Suite 106 • Fresno, CA 93711 • (559) 221-1200
3422 West Hammer Lane, Suite C284 • Stockton, CA 95219 • (209) 472-0272
9960 Business Park Dr., Suite 170 • Sacramento, CA 95827 • (916) 856-5788
4550 Kearny Villa Road, Suite 102 • San Diego, CA 92123 • (858) 279-7461