

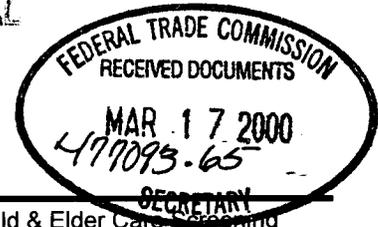


InfoMarshalls

PERSONNEL PROFILES & SECURITY ASSURANCE

Pre-Employment Screening & Assessment Testing • Tenant Screening • Child & Elder Care Screening

ORIGINAL



March 14, 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

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 certified Information Research Specialist and small businessperson, I fear we would lose a valuable and very necessary source of locating relatives and witnesses 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."

Information Professionals play an important role in our civil and criminal justice systems as well as business/private sector. 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 locate missing relatives, potential witnesses, and delinquent child support debtors, and to discover fraudulent addresses, 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.

Actually this very information is crucial in successfully locating the individual. One would need to locate the individual, in order to get signed permission to use credit header address information to locate them.

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.

Yours truly,

William Davis, Chief Operating Officer

"We provide the Tools to help you Hire and Retain star employees!"

1415 Webster Street • PO Box 704 • Alameda • California 94501

PH: (510) 864-2287 • FX (510) 315-3039