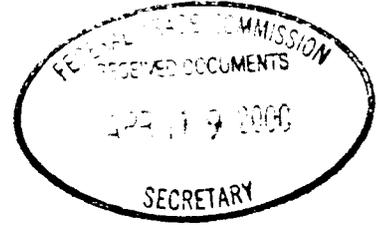




Business Controls, Inc.



Corporate

Investigations

Training

Consulting

COMPANY
~~CONFIDENTIAL~~

March 30, 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

Dear Mr. Secretary:

I am writing as a licensed private investigator and small business owner to express my concern with the proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999 which would include names and addresses of financial institution customers as "non-public personal information". If denied access to this information, we will lose a valuable and very necessary source for locating witnesses, defendants and debtors.

The clear intent of Congress was to provide financial institution customers an opportunity to deny the sharing of their personal financial information with non-affiliates of the institutions. The statute was intended to provide protection of financial information, not names and addresses. If all information available to a financial institution is defined as "non-public personal information," then what remains "public" information? Congress clearly made the distinction by describing financial information. The Act provides for denial of information regarding credit history, employment information and financial assets. Names, addresses and telephone numbers 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 current addresses and telephone numbers is essential to the conduct of our business in fulfilling our consumer obligations. We use such information to investigate fraud, embezzlement, dishonesty and theft in the workplace and in locating defendants and witnesses in civil litigation and criminal prosecution. We also use the information to locate debtors and those who are delinquent in paying child support.

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Secretary, Federal Trade Commission
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Criminals and scam artists seldom reside where their vehicles are registered. If address information is deemed "non-public personal," only wrongdoers and criminals will benefit. Law-abiding consumers will be the losers.

I urge you to define non-public personal information in the manner that Congress intended.

Sincerely,

A handwritten signature in black ink, appearing to read "Eugene F. Ferraro". The signature is fluid and cursive, with a large initial "E" and "F".

Eugene F. Ferraro, CPP, CFE
President

LRA/