

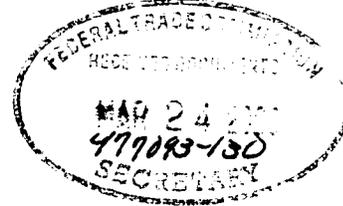


Texas Association of Licensed Investigators

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March 18, 2000

Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, NW
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. I am submitting these comments on behalf of the Texas Association of Licensed Investigators. Ours is a state organization representing hundreds of licensed private investigators that stand to lose a valuable tool if 'non-public personal information' is defined to include simple names and addresses of customers of financial institutions.

Noting in the consideration of privacy during congressional debate reflected concern about name and address information. Rather, 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. Indeed, if all information available to a financial institution is defined as 'non-public personal information', then *what is public?* Clearly congress was offering a distinction by describing financial information. We would agree that the act provides opt-out information regarding credit history, employment and financial assets. By what standard are name, address and phone number 'non public'?

Private investigators are an important integral part of the American system of jurisprudence. It is not widely understood that investigators are a critical gear in the legal machinery. The information we obtain regarding addresses and phone numbers is

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essential to our conducting business and fulfilling our obligations to consumers. We utilize this information to assist in finding witnesses, confirm addresses given on applications, and to prevent fraud—particularly insurance fraud. A high percentage of crime investigations are worked up by private investigators before being turned over to law enforcement for prosecution because law enforcement lacks the man power and resources to do so. The service of process, which is primarily done by civilian servers, would be crippled by this interpretation.

Often it is the only practical way to locate someone from attempting to flee from legal obligations for child support or other debts. Perpetrators of crimes such as stalking or scamming the elderly often do not reside at the address where their vehicles are registered. This information is essential to locating the registered owners of vehicles used in these acts.

If we lose the ability to access this information, then we will be relegated to searching by using the white pages of the phone book. Only the criminals and irresponsible will benefit. We urge you to define the non-public personal information in the manner that congress intended.

Yours truly,

A handwritten signature in cursive script that reads "Karen Hewitt". The signature is written in black ink and is positioned below the typed name.

Karen Hewitt
Chairman of the Board