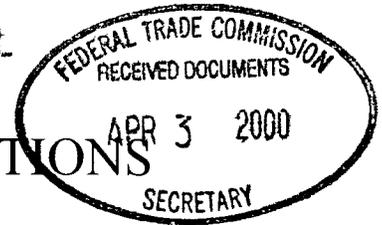


ORIGINAL



# ANOTHER SOURCE INVESTIGATIONS

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

March 18, 2000

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 licensed private investigator and small business person, I fear we would lose a valuable and very necessary source of locating witnesses, defendants 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 Congress intended 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 names and addresses. If all information available to a financial institution is defined as "non-public personal information," then what is "public"?

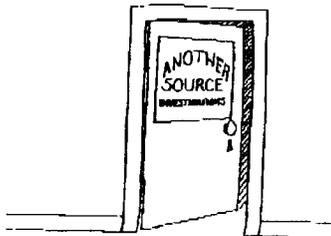
Congress seemed to be offering a distinction by describing financial information. I believe the Act provides opt-out of information regarding credit history, employment and financial assets. But name, address and phone number should not be classified as "non-public."

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 our clients. We utilize this information to assist plaintiff and defendants in civil actions; investigate embezzlement, insurance fraud, sexual harassment, locate delinquent child support debtors; aid in the defense of criminal cases; 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," our legal system will truly suffer and our citizens will be the losers. I urge you to define non-public personal information in the manner that Congress intended.

Yours truly,

Scott J. Keating



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