

Richard J. Lenihan

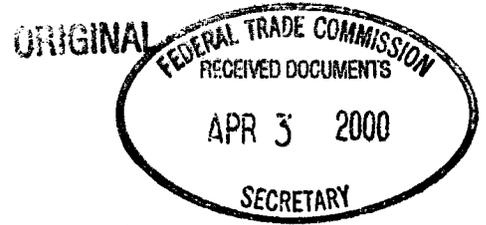
NYS Licensed Private Investigator
817 Madison Ave., Albany, NY 12208

RJL Associates

RJLAssocs@AOL.com
(518) 462-5245
(518) 427-6720 fax

March 28, 2000

Secretary
Federal Trade Commission
600 Pennsylvania Ave., N.W., Rm. H-159
Washington, DC 20580



Dear Sir/madam:

RE: Gramm-Leach-Bliley Act Privacy- Rule 16 CFR Part 313-Comment

I am a NYS Licensed Private Investigator and, as such, a small business person. If "non-public personal information" is defined to include simple names and addresses of customers of financial institutions I will lose a valuable and very necessary source of locating witnesses and suspects.

It is 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. I believe the Act is meant to provide opt-out of information regarding credit history, employment and financial assets; not name, address and phone number.

If all information available to a financial institution is defined as "non-public personal information," only wrongdoers and criminals will benefit and the law-abiding consumer will be the loser. The information I obtain regarding addresses and phone numbers is essential to the conduct of my business. In the past I have used the obtained information to investigate insurance fraud, embezzlement, locate delinquent child supporters, as well as to serve process. The "bad guys" seldom reside where their vehicles are registered. Any data-base of current address information is essential, especially since local law enforcement seldom has the manpower to develop these cases for prosecution.

The role I play as a NYS Licenses Private Investigator in the civil and criminal justice systems is not understood by many. I urge you to define non-public personal information in the manner that Congress intended.

Sincerely,
Richard J. Lenihan

Richard J. Lenihan