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As a licensed private investigator and small business owner of more than twenty years, following years of investigative service in the public sector, I am quite concerned with the proposed regulations to implementation of Title V of the Gramm-Leach-Bliley Act of 1999. We stand to lose a very valuable source of obtaining information so vital to how we conduct our investigations. "Non-public information" should not be defined so as to include simple names and addresses of customers of financial institutions.

My interpretation of the intent of the Congress was to provide consumers with the opportunity to minimize the sharing of their personal financial information with non-affiliates of those institutions. The statute provides protection for financial information and not names and addresses. If all the information available to a financial institution is defined as "non-public personal information", it remains to be seen what is considered "public"! In describing financial information, Congress allow consumers to "opt-out" of information regarding credit history, employment and financial assets. Name and address should not be considered "non-public"!

As a licensed private investigator, the State of Arizona and the FCRA regulate my actions. I am licensed, bonded and insured and involved with a number of professional organizations that seek to oversee and assist in regulating our profession. The information in question is invaluable in locating missing children, combating insurance fraud, and any number of other crimes against the consumer. Law enforcement is not in the position to pursue many such inquiries due to significant budgetary and manpower limitations. Eliminating a licensed investigator's access to such information, the "non-public personal", will benefit only the criminals, injuring further the public.

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

Sincerely,

John R.W. MacIntire Jr., President

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