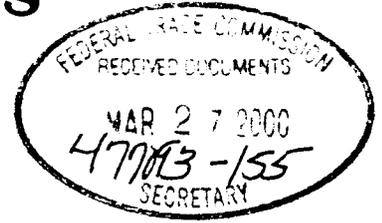


South Carolina Association of Private Investigators

**P.O. Box 1353
Pickens, S.C. 29671**

March 23, 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

To Whom it May Concern:

I am writing to express our concern with proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999. I am submitting these comments on behalf of the South Carolina Association of Private Investigators, a state organization representing licensed, private investigators throughout South Carolina. We stand to lose a valuable tool if "non-public personal information" is defined to include simple names and addresses of customers of financial institutions.

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 just mere names and addresses. 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 of information regarding credit history, employment and financial assets. By no known standard are names, addresses and phone numbers "non-public".

Private investigators are an integral part of the American system of civil and criminal justice. The information we obtain regarding addresses and phone numbers is essential to our conduct of business and fulfilling obligations to consumers. We utilize this information in a variety of legal, moral ways such as finding witnesses and insurance fraud case. The service of court papers and subpoena's, which is primarily done by non-law enforcement, would be crippled by this interpretation.

If we lose access to this information the only beneficiaries will be criminals and the irresponsible. We urge you to define non-public personal information in the manner that Congress intended.

Yours truly

A handwritten signature in black ink, appearing to read "DBM".

David B, Mac Dougall
SCAPI Legislative Liaison