

**PRIVATE INVESTIGATORS ASSOCIATION of VIRGINIA Inc.**

P.O. BOX 1115 FAIRFAX, VIRGINIA 22030

March 10, 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

Dear Mr. Secretary:

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 **PRIVATE INVESTIGATORS ASSOCIATION of VIRGINIA, Inc.** 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.

During congressional debates Nothing in the consideration of privacy reflected any 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 of information regarding credit history, employment and financial assets. By what standard are name, address and phone number "non-public"?

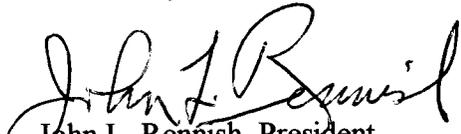
Private investigators are an important, integral part of the American system of jurisprudence. It is not widely understood that investigators are a critical cog in the legal machinery. The information we obtain regarding addresses and phone numbers is an essential tool used to conduct business and fulfilling our obligations to consumers. We utilize this information to assist in finding witnesses, to 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 resources. 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 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 non-public personal information in the manner that Congress intended.

Yours truly,



John L. Rennish, President

Private Investigators Association of Virginia