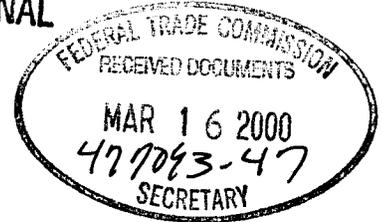


Robert P. Savoie
Private Investigations

7 Earl St.
Salem, New Hampshire 03079

ORIGINAL



March 13, 2000

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

Dear Sir or Madam:

I recently received information from several investigative and process serving organizations that I currently belong to. I am concerned about proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999.

The organizations I belong to represent thousands of private detectives and process servers. We stand to lose a valuable tool if "non-public personal information" is defined to include simple names and addresses of financial institute customers.

There was nothing in the consideration of privacy during the congressional debate that reflected 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. If all information available to financial institutions is defined as "non-public personal information" then what is public?

Clearly, Congress was offering a distinction by describing financial information. By what standard are name, address and phone number "non-public"?

Private Investigators and process servers are an important part of the American Legal System. The information we obtain with regard to names, addresses and phone numbers is essential to our conduct of business and fulfilling our obligation to consumers.

We utilize this information in locating witnesses for the service of process, locating dead beat parents, to confirm addresses given on applications for jobs, loans and a host of other uses to prevent fraud. Particularly insurance fraud.

Having served as a law enforcement officer for 30 years prior to my ten years as a private investigator, I can attest that I and many of my colleagues saw things in shades of black and white.

As a private investigator, I now see them in various shades of gray. Just as every American has the right to be defended to the best of his Attorney's ability, so to do we have a right to have law enforcement's work scrutinized for things they might have overlooked in their investigations. Private detectives fill that gap for you and anyone else who may have a need.

March 13, 2000

It is essential that we retain the right to use this information. Otherwise, another umbrella for deception has been created for those in our society that preys on those who can not protect themselves.

I and members of the many providers of these critical services to all Americans urge you to define non-public information in the manner that Congress intended.

Sincerely,

A handwritten signature in black ink, reading "Robert P. Savoie". The signature is written in a cursive style with a large, stylized initial "R".

Robert P. Savoie
Past member Board of Governors
New Hampshire League of Investigators
Member, National Association of Professional Process Servers
Member, National Association of Legal Investigators
Member, Licensed Private Detectives Association of Massachusetts