

# ARBITER INVESTIGATIONS

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March 24, 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-Comments

Dear Sir or Madam:

As a Texas licensed private investigator and small business person, I am writing to express my concerns over the proposed interpretations under Title V of the Gramm-Leach-Bliley Act of 1999. As I understand the current thinking in Washington, the category of "non public personal information" will be defined as names, addresses and telephone numbers of customers of financial institutions. In other words, this information will be off limits to private investigators unless a court order is served. This is reasonable if we are only talking about financial lending institutions. However, the problem arises when this same interpretation is applied to the big three credit reporting bureaus (Trans Union, Experian, Equifax) who furnish credit header information to the business world (including private investigators). This credit header information includes names, addresses and telephone numbers.

Without this information, private investigators would be unable to operate within the civil process system or the criminal justice system. This information provides the ability to locate dead beat parents, insurance fraud perpetrators, court witnesses, stalkers, embezzlers, drug dealers, and other scam artists.

In conclusion, I implore you to define "non public personal information" as Congress intended. We do not need an onerous interpretation that would allow the "bad guys" to go free and the "good guys" to be handcuffed.

Sincerely,

A handwritten signature in cursive script that reads "Rex T. Sherry".

Rex T. Sherry  
Owner/Manager  
Tx Lic # A-08177

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