March 16, 2000

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SECRETARY

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

RE: Gramm-Leach-Biley Act Privacy Rule
16 CFR Part 313-Comment

To Whom It May Concern:

I am writing to forward my concern with the proposed regulations to implement Title V of the Gramm-Leach-Biley Act of 1999. As a licensed private investigator and small business owner, I fear we will lose a valuable and extremely necessary source of locating witnesses and suspects if the "non-public personal information" is defined to include simple names and addresses of customers of financial institutions.

It is my understanding that 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 names and addresses. If all information available to financial institution is defined as "non-public personal information", then what is "public"? Congress seemed to be offering a distinction by describing financial information. I believe the Act provides opt-put of information regarding credit history, employment and financial assets. But name, address and phone number should not be classified as "non-public".

Private investigators play an important role in our civil and criminal justice systems which many do not understand. This information we obtain regarding addresses and phone numbers is essential to our business and fulfilling our obligations to customers and consumers. We utilize this information to investigate insurance fraud, serve process, investigate embezzlement, located delinquent child support debtors and many other things. Stalkers and scam artists seldom reside where their vehicles are registered so current address information is essential and law enforcement seldom has the manpower to develop these cases for prosecution.

If this information is deemed "non-public personal", only wrongdoers and criminals will benefit and the law-abiding consumer will be the loser. I urge you to define non-public personal information in the manner that Congress intended.

Sincerely,