



## PROBE NORTHWEST, INC.

P.O. Box 17508 Seattle, WA 98107-1208  
(206) 782-4444, fax (206) 781-1001  
probe@wolfenet.com

477093-143  
SECRETARY

March 21, 2000

Secretary  
Federal Trade Commission  
Room H-159, 600 Pennsylvania Ave, N.W.  
Washington, D.C. 20580  
[GLBRule@ftc.gov](mailto:GLBRule@ftc.gov)

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

To Whom It May Concern:

I am writing to express my concern with the proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999. As a member of the Washington Association of Legal Investigators, 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.

Nothing in the consideration of privacy during congressional debate 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. 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 essential to our conduct of 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,

*Susan M. Wakeman*

Susan M. Wakeman, CFE  
President