



OHIO CREDIT
UNION LEAGUE

January 16, 2008

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex K)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: SSNs In the Private Sector – Comment, Project No. P075414

Dear Sir or Madam:

The Ohio Credit Union League (“League”), the trade association for credit unions in Ohio, advocating on behalf of the 400 credit unions in Ohio, both federal and state chartered, and their 2.7 million members appreciates the opportunity to comment on the Federal Trade Commission’s request on the private sector’s use of Social Security Numbers (“SSNs”), the purpose which is to reduce Identity Theft.

This request is a result of the President’s Identity Theft Task Force (“Task Force”) which recently issued a strategic plan to address the identity theft problem. The Task Force recommended that federal agencies develop a comprehensive record on the use of SSNs in the private sector and analyze the necessity for these uses. The goal of such an effort is to limit the unnecessary uses of SSNs.

The FTC has established five topics on which it would like comments from the private sector. These topics are as follows:

- Current Private Sector Collection and Uses of the SSN
- The Role of the SSN as an Authenticator
- The SSN as an Internal Identifier
- The Role of the SSN in Fraud Prevention
- The Role of the SSN in Identity Theft

The use of Social Security Numbers was established in the 1930’s by the Federal Government as an identifier unique to each individual for a variety of governmental purposes. This unique identifier has evolved into a means of identifying individuals, not only by government entities, but private sector entities as well. In fact, the use of SSNs is the standard adopted by financial institutions in verifying the identity of consumers.

This practice of using SSNs for identification by financial institutions continues to expand as a result of increased government regulations based on the

USA Patriot Act, the Office of Foreign Assets Control and the Financial Crimes Enforcement Network. Moreover, the Internal Revenue Service (IRS) also continues to expand its need for SSNs.

In addition, state and local government continue to require the use of SSNs as identifiers. The use of SSNs as unique identifiers is used in deeds, mortgages, and numerous other filings. Many states, including Ohio, are addressing these issues, but the need for a unique identifier by financial institutions is critical to identify the individuals involved in these types of transactions.

In fact, there continues to be much discussion on proposed state legislation in Ohio on how best to address the need to use SSN's by the private sector especially financial institutions, including credit unions. Consequently, consideration must be given to exempt financial institutions, including credit unions, under any new regulatory requirements so that they can best access the information they need.

More importantly, financial institutions are subject to numerous regulations and oversight to safeguard this information. If the use of this type of information were prohibited, another method of determining a unique identifier will be necessary.

The League also believes that prohibiting the use of SSN's is not practicable nor feasible at this time in that there is no way to confirm the identity of an individual. Any attempt to prohibit the use of an identifier or develop a new identifier should be thoroughly reviewed. The League believes that additional consideration be given to how better protect the use of SSNs and not arbitrarily barring its use.

The Ohio Credit Union League appreciates the opportunity to provide comments on the Federal Trade Commission's request on the Private Sector Use of Social Security Numbers and would be willing to provide additional information if so requested.

If you have any questions, comments, or if I can be of further assistance, please feel free to contact me at (614) 336-2894. Thank you again for the opportunity to provide comment.

Respectfully submitted,

John F. Kozlowski
General Counsel