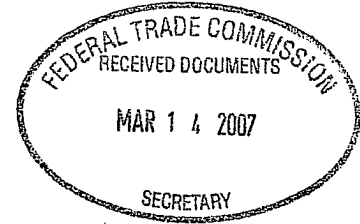


March 4, 2007

Orville Thompson

Federal Trade Commission / Office of the Secretary
Room H-135 (Annex N)
600 Pennsylvania Avenue
N.W. Washington, D.C. 20580



Ref: ID Workshop, P075402

Dear FTC Secretary,

Thank you for giving me the opportunity to provide you with some provoking thoughts regarding the in proper use of Social Security Numbers, which threatens our economy.

The following information will support the purpose of your workshop and the critical necessity of finding a resolution to authenticate the identities of individuals, without the use of Social Security Numbers, and the consequences if we don't find a solution.

The Problem:

Currently, the Television Satellite and Cable industry are requiring people's Social Security Numbers to sign up for TV reception. Some companies advertise, in the small print, that they require Social Security Numbers. Other companies direct you to their small Privacy Pamphlets which indicates they collect this information for identification purposes.

How many people know that businesses can not legally require Social Security Numbers but they can request this information from their customers. I submit very few consumers are aware of the merits of this law.

People want and need TV reception and are currently signing up, en mass, for long term commitments using their Social Security Numbers.

Was the intent of originating Social Security Numbers to provide businesses with another means of identification for their legal purposes and is this a legitimate use of this information? Of course not!

You are trying diligently to protect the publics interest by limiting the use of Social Security Numbers, but the collection of this data by the Satellite and Cable industry is counter productive to your mission of reducing ID Theft.

The government says it's legal for businesses to ask their customers for their Social Security Identification. The question should be, why aren't businesses prohibited from asking for this information? Wouldn't this resolve some of the ID Theft problems in the future?

How many people have provided their Social Security numbers to companies who don't have any legitimate reason for requiring them, except to hold their customers feet to the fire for collection purposes?

Let's look at the subscriber numbers for just DIRECTV and Dish Network companies assuming, conservatively, that 85% of their consumers have provided them with this data.

Subscriber estimates for DIRECTV and Dish Network using Internet data:

- DIRECTV (<http://en.wikipedia.org/wiki/DirecTV>) 16 Million
- Dish Network (http://en.wikipedia.org/wiki/Dish_Network) 13 Million

Total Subscribers providing SSN's (29 million x 85%) say 25 Million Subscribers

Please note, that these two companies alone are adding approximately 3 to 4 million subscribers per year. This does not include other satellite, cable or phone companies which would significantly compound the problem.

As diligent as the government and banks are in protecting people's identify, Social Security Numbers are stolen everyday from computers. Why then does the Satellite and Cable industry think they can do a better job in securing these personal identification numbers?

What risk does DIRECTV and Dish Network suffer if they don't obtain a customer's Social Security Number? Since they can identify you by other means, i.e. driver's license, there is no risk to them. If the consumer defaults, possibly there risk would be a \$250 (retail) satellite dish plus a \$100 HD receiver (retail) or two, if they couldn't collect through normal legal channels that are used and available to them.

If a person's Social Security Identity is stolen, that person and family suffers substantially emotionally, financially and spends on an average of 330 hours and 4 to 6 months trying to straighten out the problems caused by the ID Theft. The source for the 2004 survey is (<http://www.idtheftcenter.org/aftermath2004.PDF>).

So who is exposed to the most risk here? Obviously, it is the consumer that carries the greatest burden of risk, while the Satellite and Cable Industry assumes little or no responsibility.

Most consumers are not adequately knowledgeable in this area and consequently, provide their Social Security numbers, en mass, because everyone wants and needs TV reception.

Consumers are simply not appropriately aware of the hazards to them, to our government and to the public in releasing this information, to accommodate businesses zealous identification of their customers for possible credit collection or for the insignificant purchases of their products and leasing services.

Giving the numbers I have documented above, you will have future ID Theft problems, unless a solution is found soon, which is the purpose of your workshop.

Laws need to be changed now to prevent fraud that is presently spiraling out of control and threatening our economy.

PLEASE PASS A LAW THAT REQUIRES BUSINESSES TO STOP REQUIRING OR REQUESTING CONSUMER'S SOCIAL SECURITY NUMBERS. PERIOD!

OR PASS A LAW THAT REQUIRES BUSINESSES, WHO LOOSE CONSUMER'S SOCIAL SECURITY NUMBERS, TO REIMBURSE THEIR CUSTOMERS \$1,000 DOLLARS EACH, FOR THE FINANCIAL, EMOTIONAL AND TIME CONSUMING EFFORTS IN CORRECTING THE PERSONAL IDENTIFICATION PROBLEM.

CAN YOU IMAGINE THE BENEFIT TO ALL BY SIMPLY PASSING ONE OF THESE LAWS?

Thank you for your workshop and your efforts in addressing this problem.

Sincerely,

ORVILLE THOMPSON

P.S. Below is an e-mail from DIRECTV answering my question regarding requiring Social Security Numbers. Doesn't it sound like they are bribing you with promotions if you give them your SSN?

Thank you for choosing DIRECTV! Yes, we do ask all our customers for their Social Security Number upon activation. But if they refuse, we do not force them to give it, Consequently, they may be eligible for other promotions which we offer

I hope this information helps

Sincerely,

Isaac

Employee 10-100092987

DIRECTV Cus1Dmer Service