

Mr. Michael Johnson  
Shred-it Orlando  
Florida  
United States

I am very excited about R-411007, and wish to thank you for your efforts in protecting private information for the public. I am a retired Police Sergeant who is now in the information destruction and security business. Through the years I have seen many citizens victimized through identity theft and fraud, R-411007 promises to aid in the fight against this crime.

I am concerned however, that this regulation places the burden on business to insure compliance, but places no such burden on the companies charged with the secure handling and destruction of this information.

As the information destruction industry stands today there are no current rules or regulations that govern who may, and who may not own and operate an information security and destruction business. One simply has to buy a truck, choose a name and present themselves as a destruction company.

Convicted felons, those charged under Federal or state statutes with Grand Theft, financial crimes, Rico crimes and other serious violations of the public trust are not hindered in any way from becoming an information destruction company. In many cases companies trying to comply with the new laws and rules such as GLB, HIPAA, and now FACTA have no way of knowing the backgrounds of the vendors they are hiring for this service, due diligence by these companies will not assist them in this process.

I believe that it is imperative that those charged with the responsibility of securing and destroying private and sensitive information not be the very people that these rules are trying to inhibit.

As it stands now a criminal with intent, simply has to purchase a piece of equipment and have information he or she generally would have to steal, simply delivered to him/her while innocent companies try and comply with the law. We must not make this easier for the criminal at the expense of innocent business owners. The public has to be assured that their information is safe and secure when released to a vendor. The only true way to accomplish this is to keep the henhouse safe from the fox.

Please consider regulating those who purport to be information security and destruction providers, by some licensing process, this issue is far to important, and this to glaring a hole not to be addressed.