

Mr. Willie Geiser
Allshred Services, Inc.
Ohio
United States

June 14, 2004 Re: FACTA Disposal Rule; R-411007 To Whom It May Concern: Thank you for the opportunity to comment about the aforementioned rule. I am very excited about R-411007, and wish to thank you for your efforts in protecting private information for the public. It's a rule that is, unfortunately, necessary, and long overdue. Identity Theft has become a severe problem. And it's only going to get worse. We need a strong law to protect consumers. A law requiring businesses to destroy their information prior to disposal will go a long way towards solving the problem. Anything that makes it more difficult for criminals to get their hands on sensitive information will help. I am concerned, however, about one thing. If the law is passed, the potential exists for practically anybody to get into the shredding business, thereby getting their hands on the sensitive information their customers collect. Once these companies are in the business, they can do practically anything they want with the information they have collected. We need some standards to prevent this from happening. The National Association for Information Destruction (NAID), and its Certification program is, in my opinion, the way to set the standards. The Certification program is a good program. A few years ago, when no quality control standards existed, NAID took the lead and developed a program to ensure that shredding companies really did the job they said they did. NAID Certified companies are the cream of the crop when it comes to the information destruction industry. Once a shredding company has gone through the Certification process, a client can be assured that the vendor they have chosen has agreed to adhere to the strictest standards set for the industry. The client knows that all of the employees of the shredding company have had their backgrounds thoroughly checked (even the company owners), that the shredding company has the proper equipment, containers, trucks, material handling procedures, overall security and financial stability to ensure that the confidential information collected is handled and destroyed properly. An independent, third-party security auditor and the physical audit, proves it. FACTA, and the consumer public it's trying to protect, needs those kinds of standards. Our company is NAID AAA Certified and I can honestly say that the process made us a much better company. We thought we did a good job before, but going through the process of certification made us better. Our clients have been very receptive to the Certification program and are appreciative that they can use us, knowing that we can prove our capabilities. It's not just our word. I urge you to adopt these standards in the Information Disposal part of the FACTA law. Sincerely, Willie Geiser . President Allshred Services, Inc. 715 Spencer St. Toledo, OH 43609 (419) 381-7762 NAID "AAA" Certified