



**Fireman's
Fund**

Fireman's Fund
Insurance Company

January 6, 2000

Mr. Donald S. Clark
Secretary of the Commission
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, N.W.
Washington, DC 10580

Re: Advisory Committee on Online Access
Security – Nomination P004807

Dear Mr. Clark:

Fireman's Fund Insurance Company, headquartered in Novato, California, supports the nomination of Thomas Fox for the Federal Trade Commission Advisory Committee on Online Access and Security (the "Advisory Committee"). Mr. Fox is a partner in the Washington, D.C., law firm of Schwartz & Ballen, which represents the American Council of Life Insurers and the American Insurance Association on federal and state privacy and technology related matters. These insurance trade associations are also supporting Mr. Fox's nomination.

As you are aware, the Gramm-Leach-Bliley Act of 1999, Financial Services Modernization, requires insurers to follow new privacy requirements with regard to the financial information of its customers. Similarly, Health and Human Services is in the process of proposing a privacy regime for medical information. Because the business of insurance is also regulated by the states, insurers must also comply with various state privacy laws. Within this framework, it is critical that insurers are not disadvantaged by new online privacy requirements that conflict with other state and federal requirements.

We believe that Mr. Fox would be of invaluable assistance to the Advisory Committee and the Federal Trade Commission as it considers the important issues relating to implementation of fair information practices by commercial web sites generally and those issues in the context of the insurance industry specifically.

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Fireman's Fund Insurance Company writes over \$4 billion in gross written premiums and is among this nation's leading property and casualty insurance companies.

Very truly yours,

A handwritten signature in cursive script that reads "Christopher Roe".

Christopher P. Roe
Assistant Vice President

cc.

Mr. Thomas Fox
Ms. Debra Ballen