



May 12, 2004

Federal Trade Commission/Office of the Secretary  
Room 159-H (Annex H)  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Re: The FACT Act Disposal Rule, R-411007

Dear Federal Trade Commission:

I write on behalf of the National Association of Professional Background Screeners (NAPBS) to offer our organizational support for the proposed rule regarding the proper disposal of consumer report information and records. NAPBS members are committed to protecting consumer information and support the proper disposal of consumer information as a "Best Practice" standard in our industry.

By way of background, founded in 2003, the National Association of Professional Background Screeners is the international trade association that represents over 250 Background Screening Companies. NAPBS members provide millions of background checks annually to employers of all sizes, representing nearly every industry. Among the services provided by NAPBS members are: criminal background checks, civil history checks, credit reports, employment verifications, professional license verifications and motor vehicle reports.

NAPBS supports the "reasonable measures" for disposal as cited in the proposed rule (628.3). Employers of all sizes and resources use consumer information for employment related decisions and the non-prescriptive rule allows the holder of consumer information the needed flexibility to determine how best to prevent unauthorized access to that information.

Again, on behalf of the members of the NAPBS, we offer our support for The FACT Act Disposal Rule, R-411007.

Sincerely,

Curt Schwall  
Co-Chair, Government Relations Committee