



**NATIONAL ASSOCIATION
OF REALTORS®**

The Voice for Real Estate®

430 North Michigan Avenue
Chicago, Illinois 60611-4087
312.329.8411 Fax 312.329.5962
Visit us at www.REALTOR.org.

Coldwell Banker AJS Schmidt
4488 Cascade Road, SE
Grand Rapids, MI 49546
616.559.7241 Fax 616.559.7242
E-mail: pvredevoogd@realtors.org

Pat Vredevoogd Combs, ABR, CRS, GRI, PMN
President

January 18, 2007

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

Re: Identity Theft Task Force, P065410

Dear Sir or Madam:

On behalf of more than 1.35 million members of the **National Association of REALTORS®** (NAR), I am pleased to offer comments on the Federal Identity Theft Task Force's Interim Recommendations.

The National Association of REALTORS®, "The Voice for Real Estate," is America's largest trade association, including NAR's five commercial real estate institutes and its societies and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,500 local associations or boards, and 54 state and territory associations of REALTORS® and therefore has a significant interest in the outcome of this process.

NAR is a strong proponent of ID theft prevention. Identity theft continues to be a significant concern amongst our membership and the general public at large. Given the critical importance of credit to homeownership and our industry, NAR has taken a leading role in promoting identity theft awareness and prevention measures through our partnership with the FTC on the "Deter, Detect, and Defend" campaign. We believe further educational efforts would be quite valuable to consumers.

Any such efforts should include not only the usual advice to safeguard one's data from electronic theft but also proactive measures such as "opting out" of prescreened credit offers. According to the FTC's own data, a full 26% of ID Theft complaints involve credit card fraud. A significant number of these ID Theft cases are the result of stolen mail containing prescreened offers of credit and other similar offers. The proliferation of prescreened credit offers creates many opportunities for criminals to obtain personal information even without computer hacking or other electronic theft methods. Consumers should be made aware of their ability to reduce this risk through the "opt out prescreen."

NAR also believes business should be required to take reasonable and cost effective measures to protect the security of personal data. However, the government should weigh carefully the financial impositions on small business of various methods as well as the likelihood of significant risk. Imposing onerous security schemes on small business will add significant cost burdens. Costs, risks, and remedies must be balanced.

Similarly, any data breach notice requirements should also be carefully tailored to situations where tangible harm is likely. Once again, small businesses should not be put at a disadvantage and face onerous burdens because of the large stream of data breach cases emanating from government and large scale credit and financial operations.

Thank you for the opportunity to present the views of the National Association of REALTORS®. If you have any questions, please do not hesitate to contact our Regulatory Policy Representative, Ken Trepeta at (202) 383-1294 or ktrepeta@REALTOR.org.

Yours Truly,

A handwritten signature in black ink that reads "Pat Vredevoogd Combs". The signature is written in a cursive, flowing style.

Pat Vredevoogd Combs, ABR, CRS, GRI, PMN
2007 President, National Association of REALTORS®