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January 10, 2000

Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Ave., NW
Washington, DC 20580

Re: Advisory Committee on Online Access and Security

Dear Secretary Clark:

As Executive Director of the EComForum, I would like to ask your consideration in serving as a member of the Advisory Committee on Online Access and Security. The EComForum (www.ecomforum.org) represents a significant cross-section of the emerging ecommerce industry. It is not an outgrowth of a niche industry approach to ecommerce, but rather the nascent effort at being an "umbrella" around this new exciting and dynamic ecommerce industry.

The expertise which would be brought to your Committee from my participation as a member would be that gained over the last four years, representing institutions on a variety of issues where privacy was a critical concern. These issues were that of digital signature legislation, which has involved the very central issue of electronic recordkeeping; the Gramm, Leach Bliley Act, on which Cong. Inslee and others worked tirelessly to hammer out a compromise position, with which all divergent parties may live long-term.

The EComForum provides the American Bar Association with regular updated Issue Analyses on all pending high-tech concerns, including privacy. As a speaker at the APEC's most recent conference in Manila, the issue of privacy formed the central focus of debate in a standing-room only international debate. Perhaps, beyond the multitude of speeches and appearances to discuss the resolution of privacy between the public and private sectors, the ability of the EComForum to present a solution with enforcement capability is an even more important reason for our consideration on the Committee. We have worked closely with the AICPA in the development of its WebTrust product,

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and as a result, understand the details of a program that has "teeth" for the private sector to utilize.

We thank you for your consideration. We understand the submission may be slightly behind the appointed submission date. We hope that you will still provide us an open, fair consideration. The undersigned will be in attendance at each and every meeting and will participate fully in this important undertaking.

Sincerely,

Mary Clare Fitzgerald