



January 11, 2007

Attorney General Alberto Gonzales
Federal Trade Commission Chairman Deborah Platt Majoras
Federal Identity Theft Task Force

The purpose of this document is to file comments with the Federal Identity Theft Task Force.

For a number of years we have been contacted by many of our 375,000 members regarding the use by the Federal government of an individual's Social Security number as his or her Medicare identifying number.

We contacted both Medicare and Social Security regarding this issue and were summarily dismissed with "no one has ever complained about identity theft because their Medicare card uses their Social Security number as an identifier."

This, of course, does not mean that the opportunity for identity theft does not exist simply because a Federal agency employee asserts that "no one ever complained before."

Many states have used individual Social Security numbers as drivers' license identification numbers. Most of these states will substitute another identifier at the driver's request. Some health plans in the Federal Employees Health Benefits Program have used Social Security numbers as the enrollees' plan identification number. These health plans have changed to discrete identifiers in many cases; in others, the plans will issue a new number if a plan enrollee objects to the use of his or her Social Security number.

It is our view that if states and health plans can substitute other identifying numbers for enrollees and licensees, that Medicare and Social Security can assign discrete i.d. numbers in place of Social Security numbers. In fact, it out to be easy (through a computer program) to substitute new identification numbers for Social Security numbers

and at the same time renumber the electronic files on which Social Security and Medicare rely.

Sincerely,

Kenneth H. Glass, Director
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National Active & Retired Federal Employees Association