



to estimate with precision the extent to which misuse of social security numbers contributes to this problem, or the downside costs of any particular effort to revamp the way social security numbers are handled. Congress itself will have to make some tough policy choices.

I personally believe the most promising approach would be to consider an extension of the GLB Act's Safeguards Rule beyond financial institutions and focus on the way sensitive information is handled, rather than to pass laws that would prohibit myriad public and private agencies from collecting and preserving sensitive information in the first place. You still have to recognize that a principal source of social security numbers today is public records on file with every court and county clerk across the nation. Restriction of access to this information would raise particularly difficult issues.

We should, however, consider ways to discourage the routine collection of social security numbers, in circumstances where it is not essential to have such a unique identifier. This might be a very difficult matter to legislate, but we might start with a more active encouragement of private business initiatives and prudent actions by consumers themselves.