

January 5, 2000

Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

**Caption: Advisory Committee on Online Access and Security - Nomination,
P004807**
Subject: Nomination of Steven S. Emmerich for Membership to the Committee
Reference: Attached Resumé of Nominee

To Whom It May Concern:

This letter constitutes a nomination for membership to the FTC Advisory Committee on Online Access and Security on behalf of Mr. Steven S. Emmerich of Lexington, Massachusetts.

Mr. Emmerich is Chairman, President & CEO of FairAccess.com Corporation, a Massachusetts-based high-tech start-up whose mission is to market enterprise software products which enable corporations to accomplish the following:

- Communicate to customers (a) the customer profiles that the corporation has gathered about them; (b) the corporation's (past and contemplated) reasons for collecting and intended purposes for using that data; and (c) the corporation's understanding of the (tacit and explicit) permissions that the corporation believes it has been granted by the customer for use of that data.
- Enable customers to exercise their opt-in/opt-out privacy rights as provided for in Self-Regulatory Measures and Worldwide Data Privacy and Protection Laws.
- Propagate the results of customers exercising these rights appropriately within the corporation's customer information management infrastructure.

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- Enable corporations otherwise to understand, plan for, comply with, and audit themselves with respect to domestic Self-Regulatory Measures and worldwide data protection and privacy laws.
- Provide other tools by which corporations may actively reinforce the “trust relationship” in the area of consumers and regulators in the area of privacy rights between corporations.
- Perform all of the above with appropriate security safeguards to ensure appropriate confidentiality both within and without the corporation.

Mr. Emmerich’s qualifications for membership on the FTC Advisory Committee on Online Access and Security are as follows:

- Since 1989, Mr. Emmerich has been Chairman and CEO of Q-SPAN Information Systems (formerly Paralogic Inc.), a consulting firm providing large corporations with technology solutions for enterprise-wide data warehousing and transaction management solutions, most recently in the area of customer information management. These solutions have focus particularly on assuring appropriate aggregation of customer data to suit business purposes; designing data integrity and quality processes especially for customer profiles; supporting business rules for client relationship management; and most recently ensuring compliance with European Data Protection and United States Privacy laws (as well as contemplated Safe Harbor provisions of the FTC). As a business consultant, Mr. Emmerich has exercised his knowledge of the domestic and global laws and regulations governing privacy to balance the business needs for customer information with the privacy rights of consumers. His understanding of the needs for corporations to reconcile these business objectives and his efforts to design solutions that enhance corporate-to-customer relationships while enforcing customer privacy rights is motivating Mr. Emmerich to found FairAccess.com. Over the past ten years, Mr. Emmerich has had a leadership role in numerous consulting engagements related to these areas, for such corporations as Citibank, Nellie Mae Corporation, and Sotheby’s.
- Mr. Emmerich understands and is keenly interested in the technical means available to perform “customer profiling” in both the online and non-online environments, i.e. extracting customer information from Web sites and integrating that information with other customer profile data (e.g. from corporate databases and syndicated data sources). He has an especial expertise in assuring the quality of the resulting data, having focused Q-SPAN Information Systems’ services on data quality management in the context of Data Warehousing, Enterprise Application Integration, Customer Information Management, and other aspects of E-Business Integration. In particular, under Mr. Emmerich’s leadership, Q-SPAN has developed a product called

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DataTrust™ targeted to assure the quality of customer databases in the enterprise data warehousing context. Mr. Emmerich is a recognized technical expert in the technologies and practices underlying the fields of Data Warehousing, Data Quality Assurance, and Customer Relationship Management, and has given numerous talks on these subjects at professional conferences.

- Mr. Emmerich also possesses expertise relating to Web protocols and capabilities. Mr. Emmerich has been a user and software developer on the Internet since 1980, when he was a manager at the consulting firm Bolt, Beranek, and Newman which contributed heavily to the development of the TCP/IP protocols underlying the Internet and the Web. Over the course of his career, he has individually performed (and managerially been responsible for) operating systems and communications software development for a number of system companies. Since 1989, he has personally contributed to the development of several distributed applications, and has become intimately familiar with the communications protocols and programming paradigms used on the Internet and on the Web.
- Mr. Emmerich is highly knowledgeable about building systems for regulatory compliance that incorporate legal and regulatory rules as well as customer profile data, in order to achieve compliance. Between 1993 and 1996, Mr. Emmerich led the development of a system of human processes and computer applications for managing global equity compliance reporting to the Federal Reserve and SEC, on behalf of one of the world's largest, most globally-oriented U.S. money-center banks. This system performed routine compliance with SEC "Section F" reporting, and resulted in the Federal Reserve granting the bank long sought-after increases in equity trading powers in the U.S. The systems' deployment was successful, and continued to manage the needs of the bank until the bank's merger within a larger entity superceded its usefulness.
- Mr. Emmerich also has substantial expertise regarding systems that determine appropriate processing steps in relation to customers by applying rules embodied within an "inferencing engine" to previously acquired customer data. In 1999, Mr. Emmerich was the architect for a customer relationship management data warehouse and real-time workflow engine embedded within a comprehensive Customer Relationship Management product for the telecommunications industry. This product integrated a customer-centric operational data store from which a rule-based inferencing engine made real-time customer management decisions. This system supported Network Maintenance, Provisioning, Activation, Service Order Processing, Billing, Marketing, Customer Service, Operations, and Sales Information Management.

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- Mr. Emmerich has nearly 25 years expertise in developing applications and running organizations providing on-time, on-budget delivery of complex projects.
- Mr. Emmerich is deeply familiar with both government- and industry-sponsored initiatives (regulatory and technical) in data privacy and protection. In the governmental arena, Mr. Emmerich is familiar with the Federal Trade Commission's initiatives (in online privacy, Children's online privacy, Fair Information Practice Principles, and Safe Harbor provisions); Congressional initiatives (the Gramm-Leach-Bliley Act, HR313, HR3320 and HR3321); and the European Union Data Protection Directive (adhering legislation within the U.K. and a number of other EU countries). With respect to industry initiatives, Mr. Emmerich is familiar with the Open Profiling Standard; the P3P Platform for Privacy; and the ICE Information Content and Exchange Protocol. Specific company offerings with which Mr. Emmerich has some familiarity are those of infomediaries such as Lumeria and PrivaSeek.
- As someone with experience and knowledge in all of these areas, Mr. Emmerich would like to contribute to the Committee's efforts as a public service.

Mr. Emmerich is fully prepared to undertake the responsibilities for Committee membership outlined in FTC publications.

Thank you for your consideration.

Yours Sincerely,

Steve Emmerich, President & CEO
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FairAccess.com Corporation
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