

CERTIFIED FINANCIAL PLANNER  
BOARD OF STANDARDS, INC.

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May 12, 2008

Nancy Morris, Secretary  
Securities and Exchange Commission  
100 F Street, NW  
Washington, DC 20549-1090

Subject: File Number S7-06-08 (Proposed Amendments to Regulation S-P)

Dear Ms. Morris:

The Certified Financial Planner Board of Standards, Inc. (CFP Board) appreciates the opportunity to once again comment on the Securities and Exchange Commission's (SEC) proposed amendments to Regulation S-P.

We share the SEC's concern that the public is increasingly at risk as a result of sophisticated methods of attack on sensitive personal information. We commend the SEC for its proposal to increase requirements for safeguarding such information and for developing standards to respond to data security breaches. Both are consistent with CFP Board's mission to benefit the public.

By way of background, CFP Board establishes and enforces education, examination, experience and ethics requirements for CFP<sup>®</sup> certificants. The mission of CFP Board is to benefit the public by granting the CFP<sup>®</sup> certification and upholding it as the recognized standard of excellence for personal financial planning. CFP Board currently oversees more than 57,000 financial professionals holding the CERTIFIED FINANCIAL PLANNER<sup>™</sup> certification.

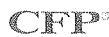
CFP Board has prepared three comments in response to the Proposed Amendments to Regulation S-P, which are detailed below.

### **1. Information Security Programs**

(a) 3. CFP Board supports the concept of designating an individual to serve as coordinator of the information security program, though questions the practicality of identifying such person by name given the likelihood of turnover within a firm. CFP Board urges the SEC to consider designating the position rather than naming a person explicitly.



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Certified Financial Planner Board of Standards Inc. owns these certification marks in the U.S., which it awards to individuals who successfully complete CFP Board's initial and ongoing certification requirements.

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(a) 4. CFP Board seeks clarification from the SEC concerning *sub-bullet v*. Does this section presume that an investment adviser must have all the information required by Form SP-30 before such a notice is issued? If yes, then CFP Board believes such an action is not in the public interest, and fails to meet the “as soon as possible” standard. In the alternative, CFP Board urges a policy that encourages an immediate notification, followed by a more fulsome explanation as required by Form SP-30 once all information has been compiled.

(a) 5. CFP Board encourages the SEC to include references to current best practices concerning responses to identity theft. These include, but are not limited to, the recommendation of enrolling in a credit monitoring service.

CFP Board appreciates the opportunity to comment on this proposal. If you have any questions concerning our comments, please feel free to contact me directly at 202-379-2230.

Sincerely,

A handwritten signature in blue ink that reads "Michael Shaw". The signature is fluid and cursive, with the first name "Michael" and last name "Shaw" clearly legible.

Michael Shaw, Esq., ChFC, CLU, CRCP  
Managing Director, Public Policy & Legal

MPS/gbc