

**CITY OF REDDING, CALIFORNIA  
COUNCIL POLICY**

<b>SUBJECT</b>	<b>RESOLUTION NUMBER</b>	<b>POLICY NUMBER</b>	<b>EFFECTIVE DATE</b>	<b>PAGE</b>
Identity Theft Prevention Program	<b>2009-37</b>	<b>1413</b>	<b>04/21/09</b>	<b>1</b>

**BACKGROUND**

The City of Redding, subject to oversight by the Federal Trade Commission, has the responsibility of developing an Identity Theft Prevention Program (Program) as required by the Fair and Accurate Credit Transactions Act of 2003 (FACT Act). The FACT Act requires the City to develop and provide for the continued administration of such a Program to detect, prevent, and mitigate identity theft in connection with new or existing accounts covered under the Act. The Program will be administered by the Utility Customer and Field Services Division to serve the five Utility Divisions and their customers.

**PURPOSE**

The purpose of this Policy is to provide uniform and consistent guidelines for the development and administration of the Program to protect utility customers' personal information. The City of Redding Utilities meet the definition of a creditor with covered accounts and are therefore subject to FACT Act legislation.

**POLICY**

The following is the policy of the City Council of the City of Redding regarding the development and administration of the Program:

1. The Program will be developed and administered as required by the FACT Act.
2. The Program will include all reasonable elements required by the FACT Act as found in the Code of Federal Regulations Title 16, Part 681.
3. The City Council will serve as the oversight body, or Board of Directors, for the Program.
4. A Privacy Officer, the Electric Utility Director, shall be identified as the designee of the Board of Directors to direct and monitor the Program.
5. The Program will be updated annually to reflect changes in risks to customers or to the safety and soundness of the utility billing system.

This Policy shall not be construed to limit or modify any defense including, but not limited to, defenses based upon the statute of limitations, which may be available to the City should litigation result.