Comments of the Policy and Economic Research Council (PERC) on the December 10, 2019 Accuracy in Consumer Reporting Workshop

Submitted to:
Federal Trade Commission,
Office of the Secretary
Constitution Center
400 7th St., SW, 5th Floor, Suite 5610
Washington, D.C., 20024

31 January 2020

Introduction

PERC is pleased to submit the following comment regarding the FTC and CFPB Workshop on Accuracy in Consumer Reporting. PERC's president, Dr. Michael Turner, served on the nationwide consumer reporting agency (NCRA) data accuracy panel ("Current Accuracy Topics for Traditional Credit Reporting") at the workshop.[1] These comments are an extension of those offered by Dr. Turner at the time.

By way of a summary of the comments to follow, PERC offers:

(1) There is a clear need to undertake a rigorous assessment of the accuracy of credit file data maintained by NCRAs. It has been a decade since this issue was credibly explored by PERC and the FTC in separate studies. Since then, there have been significant changes in the policies that govern the NCRAs (e.g. National Consumer Assistance Plan or "NCAP"), and NCRA data accuracy practices;

(2) Either as part of the proposed NCRA credit file data accuracy study, or as a stand-alone report, the national consumer dispute resolution system should be evaluated. Such an evaluation must include consumers, data furnishers, and NCRAs. Issues to explore include consumer experience with eOscar; consumer experience with direct disputes to data furnishers and NCRAs; the evolution of eOscar over time; the emergence of other channels for consumer disputes (e.g. the use of the CFPB's complaint portal to dispute credit report contents); and the extent to which the dispute resolution system may be vulnerable to being gamed (e.g. credit clinics);

(3) Data from the CFPB's consumer complaint portal is frequently cited as a justification for new policies around credit information sharing. PERC recommends that a report be undertaken examining the nature of complaints submitted to the CFPB's portal. This should carefully explore: (1) the types of complaints; (2) whether they are actually complaints or are something else; (3) the source of the complaints (e.g. consumer vs. credit clinics); and (4) what inferences can and cannot be drawn from this data, such as comparisons of overall complaint volumes among different types of institutions. It is PERC's view that too often data drawn from the CFPB's consumer complaint portal is being used unscientifically for self-serving advocacy purposes and that some official position on the meaning and significance of this data would help; and,

(4) Mobile network operators (MNOs)—including Verizon, AT&T, Sprint, T-Mobile, and US Cellular—provide customers with an estimated $200 billion in loans per year.[2] Their credit activities are growing at a rapid rate as smart phones and devices

---

[1] *See* https://ftc-workshop-accuracy-consumer-reporting.videoshowcase.net

[2] In the Fall of 2018, I attended a meeting in Washington, DC with delegates from the five largest MNOs to discuss credit reporting payment data. They objected to doing so on grounds that it would promote competition among them—an odd position given that this outcome benefits their customers

[2] In the Fall of 2018, I attended a meeting in Washington, DC with delegates from the five largest MNOs to discuss credit reporting payment data. They objected to doing so on grounds that it would promote competition among them—an odd position given that this outcome benefits their customers
and the economy by promoting innovation and price competition; but understandable in the context of an oligopolistic market structure. A delegate from the CFPB was present.

> become increasingly essential.[3] MNOs use credit reports to determine eligibility for service plans (e.g. international), eligibility for credit on handsets, and for other credit. They also report defaults and collections, either directly (Verizon) or indirectly. Regulations must catch up with economic reality—phone companies are large and rapidly growing financial services entities that should be required to fully report payment data to NCRAs to make their reporting more complete.

PERC, a nonprofit think tank based in Durham, NC, has focused on issues pertaining to financial inclusion and credit information sharing since our inception in 2002. We have influenced national credit reporting policy in the US and in more than 25 countries. PERC has collaborated with multilateral organizations, US government agencies including both the FTC and CFPB, foreign government agencies, advocacy groups, other nonprofits, foundations, and private sector actors on a broad range of economic and social policy issues involving data sharing. We offer a unique perspective on credit reporting issues by virtue of extensive experience within a diverse range of contexts on a wide variety of policy and business issues. We humbly submit our comments below for your consideration.

A few thoughts on NCRA data accuracy

A discussion on Accuracy in Consumer Reporting should start with the facts on the degree of accuracy.

A pair of studies that began about a decade ago remain the most definitive sources of information on accuracy in consumer reporting, the May 2011 PERC study and the December 2012 FTC study, publicly released in February 2013.[4]

Prior to these studies, there was little hard data on the rate of inaccuracies in credit reports and their impacts. The earlier studies made use of complaints, consumer self-reporting in surveys, anecdotal evidence, or dispute data at the NCRAs. These produced wildly different estimates of rates of inaccuracies. Different groups, such as consumer advocates or industry, used their own sets of numbers, all of which were deemed unreliable by the GAO.[5]

---

[3] *Ibid.* The MNOs represented having extended over $50 billion in credit in 2017, and projected over $150 billion in credit for 2018. Hence, my estimate is likely conservative given the demonstrated growth rate in MNO lending.

[4] Michael Turner, Robin Varghese, & Patrick Walker, U.S. Consumer Credit Reports: Measuring Accuracy & Dispute Impacts. Chapel Hill: Policy & Economic Research Council (PERC), May 2011, available at http://www.perc.net/wp-content/uploads/2013/09/DQreport.pdf; & Report to Congress under Section 319 of the Fair and Accurate Credit Transactions Act of 2003, Federal Trade Commission, December 2012, (hereinafter "FTC Report") available at http://www.ftc.gov/os/2013/02/130211factareport.pdf; For a comparison of the results from these two studies, *see* https://www.perc.net/wp-content/uploads/2017/10/FTC_PERC-Layout2.pdf

[5] Richard J. Hillman, "Limited Information Exists on Extent of Credit Report Errors and Their Implications for Consumers." Statement for the Record Before the Committee on Banking, Housing, and Urban Affairs, U.S. Senate. Washington D.C.: United States Government Accountability Office,

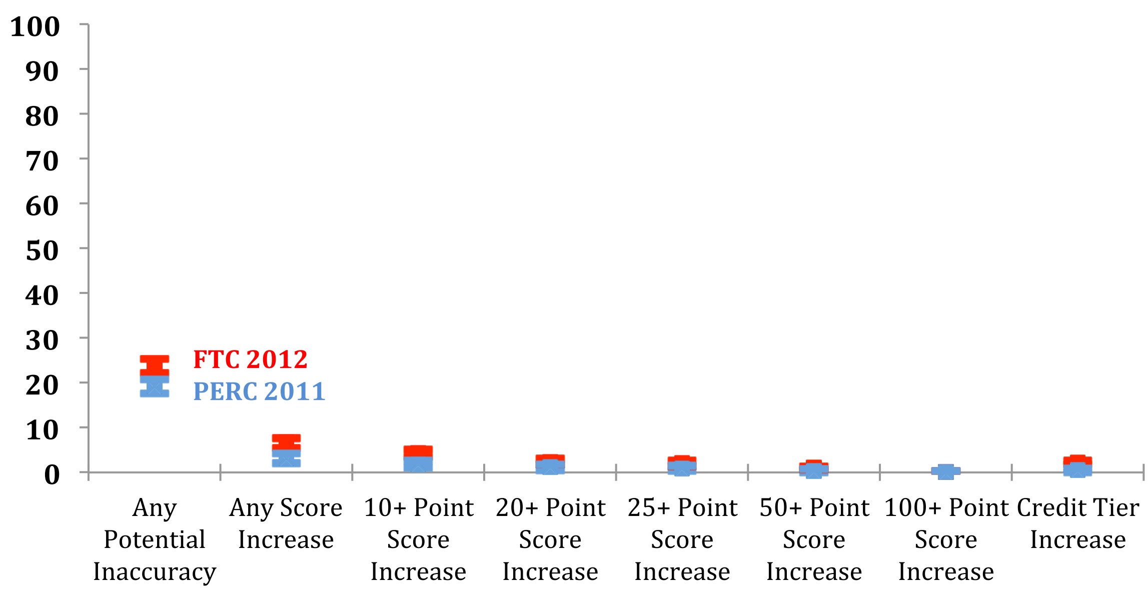
A consensus had emerged on the general approach that should be taken to examine credit report accuracy. A sufficiently large sample of consumers (at least 1,000) that are generally representative of the adult US population (more specifically the NCRA databases) should review one or more of their credit reports, identify (alleged) inaccuracies, and then dispute these. The resulting changes and credit score impacts should be measured.

Both the PERC and the FTC used this general approach, though each added different elements and had differences in specific methodologies. From our perspective, the key methodological differences being that the FTC had a more "hands-on" approach, utilizing coaches to assist consumers in identifying inaccuracies and disputing them.

Despite the differences, the two reports produced results that were in remarkable agreement, with many of the key results being statistically identical, see Figure 1.

Figures 1 and 2 are from PERC's 2013 report, "Comparing FTC and PERC Studies on Measuring the Accuracy of U.S. Consumer Credit Reports."[6]

Figure 1: PERC and FTC Results: Percent of Credit Reports Impacted



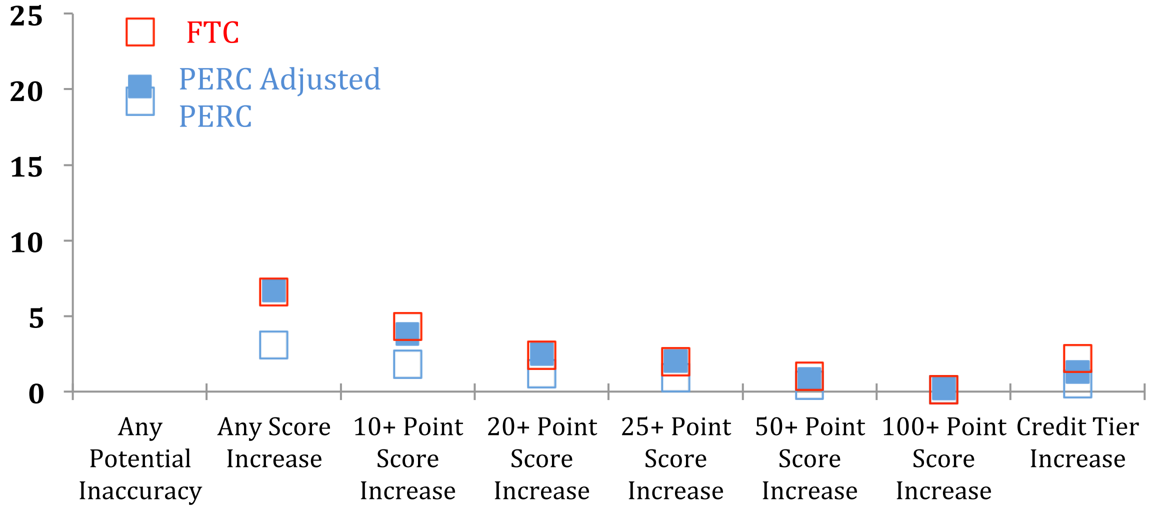
Horizontal lines depict the 99% upper and lower confidence intervals for each estimate

The differences in results that did exist may have been a result of some consumers in the PERC study (that did not use coaches) choosing not dispute alleged inaccuracies.

Financial Markets and Community Investment, March 2005, available at https://www.gao.gov/assets/90/82043.pdf

[6] Michael Turner et al., *Comparing FTC and PERC Studies on Measuring the Accuracy of U.S. Consumer Credit Reports*. Chapel Hill: Policy & Economic Research Council (PERC), April 2013, available at http://www.perc.net/wp-content/uploads/2017/10/FTC_PERC-Layout2.pdf

Figure 2: PERC and FTC Results: Percent of Credit Reports Impacted



However, a section in the 2011 PERC study adjusted results to account for non-disputing consumers. The "headline" PERC and FTC results along with the adjusted PERC results are shown in Figure 2. While the headline FTC and PERC rates are similar (though the FTC rates are somewhat higher), the FTC and adjusted PERC rates are astonishingly similar.

These two reports represent a seminal achievement, the first meaningful measures of credit report data accuracy.

The rate of inaccuracies in credit reports that could result in a 25+ point decrease in a credit score is around 2% and the rate that could result is a lower credit tier (even as a consequence of a 1 point change in a credit score) is in the 1% to 2% range. This last rate is the material error rate. These rates are far lower than previous numbers cited by consumer advocates and higher than some numbers proffered by industry. This suggested that credit reports, in a practical sense, were remarkably accurate, with 98% to 99% of credit reports either entirely accurate or containing inaccuracies that only had no impact or a small impact rather than a large or material one.

I highlighted this key fact on the panel I was on at the December 10, 2019 FTC and CFPB Workshop on Accuracy in Consumer Reporting.

In addition, I noted some of the steps that have been taken by NCRAs, data furnishers, and other actors in the industry since those reports that may have acted to further improve credit data accuracy (IT/systems improvements, NCAP, greater consumer access to data to review and dispute, etc.). These and other developments were noted by those from the NCRAs on my panel as well. The consumer advocates/attorneys on the panel also noted some of these developments. Since I am unaware of any developments that that would have degraded the overall level of credit data quality since 2010, I assume that credit data quality must have only *improved* since then. The exact degree of this suspected improvement is not known (at least publicly). This alone should justify a new study on data accuracy.

As we are approaching the ten-year anniversaries of the PERC and FTC studies it seems reasonable to begin planning new studies to measure the progress made since those original benchmarks and capture other useful data to help further improve data quality going forward. In some senses this should be a more straightforward exercise, since one of the core elements would be to compare results to the earlier studies, this would mean replicating the methodologies to make a meaningful comparison. One of the challenges would be given the low rates of material errors, it may be difficult to determine statistically significant reductions (unless they are sufficiently large and /or the sample sizes are sufficiently large). Of course with sufficient time and budget, this becomes a non-issue. In reality, time and money always play a constraining role.

A new study or studies could also examine the dispute resolution process: consumer satisfaction, any parts of the process that may be difficult for consumers, satisfaction with outcomes, and then drill down on those dispute outcomes for which consumers were not satisfied. Why were consumers not satisfied – was there, somehow a breakdown in the system for those instances? That said, the 2011 PERC study did survey consumers on their satisfaction (though it was not a major element of the study). In that survey, only 5% of consumers were not satisfied with the outcome of their disputes.

Concerns about How CFPB Complaint Data are Used/Interpreted

What I found concerning about my CFPB panel was that the CFPB complaint portal and the volume of complaints about NCRAs were cited as data sources to gauge consumers' experiences and by inference data quality.[7] This seems to be turning back the clock and returning to junk analysis when it comes to credit reporting.

The complaint portal may be useful as a complaint portal (I would imagine). It may also be helpful when looking for specific examples/anecdotes, or even when looking for new issues that surface that can then be further examined. But using metrics from volumes of complaints, or changes in volumes, particularly for the NCRAs, will likely result in junk analysis.

Consider the following "back of the envelope" look at the complaint data.

[7] Remarks of Ed Mierzwinski of US PIRG. Workshop on Consumer Data Accuracy. Panel 2. December 10, 2019.

Table 1: Total Volume of Complaint Portal Complaints by Company

	Equifax	Experian	TransUnion	Bank of America	JPMC	Citi	Wells Fargo
2019	41,036	37,054	38,921	7,550	8,265	7,063	7,431
2018	30,091	29,949	28,380	8,318	8,911	7,270	8,799
2017	30,757	21,775	22,059	8,780	8,393	7,198	9,072
2016	15,982	13,955	12,993	9,787	8,766	8,707	11,209
2015	12,016	10,841	10,179	9,840	7,973	6,209	9,285
2014	9,971	10,258	8,046	10,292	7,745	5,773	9,178
2013	4,785	5,280	3,563	16,466	7,995	5,884	11,131
2012	624	730	467	16,064	7,291	5,439	9,467

Data from searching company names on CFPB Complaint web interface for the period 1/1/2012 to 1/1/2013, and so on.

In Table 1, the fact that the NCRAs have more complaints than the large banks (after 2014) is not meaningful since this does not take account of the number of customers/consumers served by each entity. Entities that serve more consumers should have more complaints holding everything else constant.

Table 2: Estimated Per Consumer Volume of Complaints by Company

	Equifax	Experian	TransUnion	Bank of America	JPMC	Citi	Wells Fargo
2019	0.019%	0.017%	0.018%	0.010%	0.014%	0.033%	0.010%
2018	0.014%	0.014%	0.013%	0.011%	0.015%	0.034%	0.011%
2017	0.014%	0.010%	0.010%	0.012%	0.014%	0.034%	0.012%
2016	0.007%	0.006%	0.006%	0.014%	0.015%	0.041%	0.015%
2015	0.005%	0.005%	0.005%	0.014%	0.013%	0.029%	0.012%
2014	0.005%	0.005%	0.004%	0.014%	0.013%	0.027%	0.012%
2013	0.002%	0.002%	0.002%	0.023%	0.013%	0.028%	0.014%
2012	0.000%	0.000%	0.000%	0.022%	0.012%	0.026%	0.012%

Data based on Table 1, then divides each figure by estimated entity size. The NCRAs were estimated to have records on 220 million consumers, the estimated sizes of the large banks are from number of customer accounts from https://www.depositaccounts.com/banks/assets.aspxaccount holders.

First, if one were to take the volumes seriously in Table 1, then using estimated complaints per consumer/customer shown in Table 2 one would conclude that customer satisfaction has been 99.96% or higher for the large NCRAs and banks over the last several years. In fact, while not shown, the complaint volumes for some higher cost lenders (such as Advance America, Cash Advance Centers, Inc.) have a much lower level of complaints or even per customer complaints than the large banks. It seems implausible that payday loan borrowers are more satisfied with payday lenders than borrowers are with mainstream lenders—but one could use the CFPB complaint portal data naively to argue that point.

While the PR departments at the alternative financial services (AFS) firms may like these numbers, I doubt anyone would take them seriously. (No doubt all the different types of financial firms have much better internal complaint data.) So, it should be clear that the absolute levels of these numbers (or the per consumer numbers) have little meaning.

Then what about the relative levels across firms and different types of firms? For most of the years, except the most recent years, the NCRAs had lower level of per consumer complaints than the large lenders. But while the lenders have had a relatively stable level of complaints over the years, the rate for the NCRAs have skyrocketed.

Why? It appears that over time more and more normal credit disputes (per the FCRA dispute mechanism) are being reported as complaints on this portal. Much of this appears to be driven by credit clinics (many of which are unscrupulous actors aiming to game the dispute system). For instance, one of the national NCRAs estimated that over 90% of the complaints on the CFPB complaint portal between 2015 and 2019 were standard credit data disputes, not really *complaints, per se.* In 2019 over a quarter of the complaints were the first time the NCRA was notified by the consumer at all. So, many consumers are using the portal as a way to dispute data via the FCRA process, not really *complain* about a company.

The same NCRA provided estimates that in 2015 some 9.8% of total complaints were driven by credit clinics and that this exploded to 55.1% in 2019. That is, the skyrocketing complaints regarding NCRAs is driven by consumers simply using this portal to carry out normal disputes via the FCRA process and by credit clinics.

Further, in addition to NCRAs having vastly more data subjects within their databases, they also have many more data points creating many more opportunities for consumer "complaints"—although in this context, these are technically not complaints but are really disputes that should not even be counted in the CFPB's complaint portal, unless they are complaints about outcomes from the dispute process.

Therefore, comparing complaint levels among different types of firms, such as lenders, to NCRAs is meaningless. It is unclear how one would perfectly or even adequately control for such differences (and other important differences) to make meaningful comparisons. It would be comparing apples to thoroughbreds. With that caveat, it is interesting to note that if one *did* exclude "credit clinic driven" or "dispute" complaints, then the NCRAs have lower or much lower per consumer complaint rates compared to the large lenders. But were someone to make that argument, US PIRG would certainly accuse them of playing fast and loose with the data. They would be right—and that is our point. This data is simply not useful for such comparisons—regardless of your views on banks, credit bureaus and other financial services entities.

Then getting into the notion that a complaint/dispute regarding a NCRA could actually be over data supplied to the NCRA by Wells Fargo, for instance, makes the interpretation of a NCRA complaint even more difficult.

Intra-industry comparisons *might* be more useful, but that would likely still be very problematic. Note that there is a relative "pop" in complaints for Wells Fargo in 2016 after the issue of extra accounts surfaced and for Equifax in 2017 after their data breach surfaced. However, these were after those issues were publicized, and the changes in volumes did not present a leading indicator of the issues.

Finally, the NCRA complaint data does not even appear to track actual consumer disputes received by the NCRAs. Consumer disputes are not growing at the rate that disputes on the complaint portal are growing (since credit clinics and consumers are simply now more likely to report to the complaint portal). In addition, the *volumes* are not comparable at all. While the number of complaints for each of the NCRAs was around 40,000 in 2019, the number of disputes reported by one of the NCRAs was well over 10 million. If a large credit clinic started reporting disputes to the portal or emphasized reporting to the portal, that would cause a large shift in the complaint portal volumes (while not changing the total number of disputes). So, even as a gauge of consumer dispute activity, the complaint portal volumes appear meaningless.

The CFPB website clearly notes the limits of the complaint data and the volumes of complaint.

> "What you should consider when using the data:
>
> This database is not a statistical sample of consumers' experiences in the marketplace. Complaints are not necessarily representative of all consumers' experiences and complaints do not constitute "information" for purposes of the Information Quality Act.
>
> Complaint volume should be considered in the context of company size and/or market share. For example, companies with more customers may have more complaints than companies with fewer customers. We encourage you to pair complaint data with public and private data sets for additional context.
>
> The Bureau publishes the consumer's narrative description of his or her experience if the consumer opts to share it publicly and after the Bureau takes steps to remove personal information. We don't verify all the allegations in complaint narratives. Unproven allegations in consumer narratives should be regarded as opinion, not fact. We do not adopt the views expressed and make no representation that consumers' allegations are accurate, clear, complete, or unbiased in substance or presentation. Users should consider what conclusions may be fairly drawn from complaints alone."[8]

While this disclaimer is accurate and helpful, those wishing to misuse data from the CFPB complaint portal for their own agenda are undeterred. Consequently, we think there is real value in the CFPB generating a white paper on how data from the complaint

[8] Downloaded at: https://www.consumerfinance.gov/data-research/consumer-complaints/#what-you-should-consider

portal should be used and interpreted. It could draw upon existing examples and explain why they are correct or incorrect. Because national lawmakers use this data to justify policy changes, this would be a justifiable use of CFPB resources.

Requiring MNOs to Report Credit and Payment Data

Nominally, the credit information sharing (CIS) system in the United States is "voluntary," "comprehensive," and "full-file" under the Fair Credit Reporting Act (FCRA). In reality, the system in the US is a hybrid system. Regulated lenders have little choice but to report to NCRAs, hence it is not entirely voluntary. Data maintained in FCRA-regulated databases at the NCRAs is overwhelmingly financial data (bank and non-bank), with far less payment data from non-financial creditors such as mobile network operators (MNOs), landlords, energy utilities, and media service providers (CATV, broadband ISPs, wireline telecoms). Thus, the data is only partial and could be far more comprehensive. Finally, while most financial institutions report both timely and late payment data, the overwhelming majority of non-financial data furnishers report only late payment data, typically defaults and collections, directly or indirectly. Consequently, the US CIS system is not truly full-file but has large amounts of so-called "negative-only" data as well.

PERC believes this should be rectified—and that the US CIS system should be mandatory, comprehensive, and full-file for all significant creditors, particularly for those that use the US CIS system—financial and non-financial alike.

Today, for regulated lenders, the CIS system is *de facto*, though not *de jure*, "mandatory" reporting regime. Attempts by creditors to withhold credit limit, current balance, payment amount and other pieces of information about borrowers has been disallowed by relevant regulatory agencies.[9] For instance, CapOne did not report credit limit information to NCRAs for some years. This was frowned upon by regulators, who eventually persuaded them to provide that critical piece of information to NCRAs. Similarly, at least one major financial institution recently threatened to only report to a single NCRA in an effort to secure a "sweetheart" deal (pay a lower unit cost for credit reports).[10] This too was frowned upon by regulators, who dissuaded this financial behemoth from this anti-consumer, anti-competitive behavior.

It was found to be harmful to CapOne cardholders owing to the fact that one's utilization rate (the amount of credit used against the total available credit) is a key part of a major category that accounts for roughly 30% of a person's credit score in some of the more widely used generic credit risk models.[11] Thus, should creditors withhold this particular

[9] See Heller, Michelle. "FNCRA Hearing to Shine Spotlight on Credit Process." *American Banker*. 12 June 2003. Downloaded at: https://www.americanbanker.com/news/fNCRA-hearing-to-shine-spotlight-on-credit-process

[10] Discussions with senior executives at an NCRA, and examination of communications between large financial institution and the same NCRA.

[11] See https://www.myfico.com/credit-education/whats-in-your-credit-score

piece of information, accurately assessing a borrower's utilization rate is impossible, and there could be significant impacts on the borrower's credit score as a consequence.

Concerning the comprehensiveness of the US CIS system, the data is overwhelmingly financial (bank and non-bank financial institutions), despite the fact that non-financial entities are established lenders extending hundreds of billions of dollars in credit annually and are growing rapidly.

Worse still is the fact that such non-financial lenders are using credit reports for customer eligibility determination, and are credit reporting late payment data to NCRAs but are generally not reporting positive payment data. That is, they are benefiting from an information sharing system supposedly predicated upon the principle of reciprocity, but are under-furnishing information about their own customers brazenly to exact above-average rents from them and reduce overall competition within their industry. This behavior harms consumers, harms the economy (through reduced competition in a large technology sector and enabling price control), and violates the spirit of the FCRA.

While these issues may seem to be unrelated to data accuracy in a narrower context, thinking more broadly, how accurate is a credit report—and by extension a bureau credit score derived from the credit report data—when vital pieces of predictive data are unavailable, or when only some tradeline data are shared (*e.g.* negative data) but not other data (*e.g.* timely payment data and credit limits). This is the case today in the US.

To be clear, this is not the fault of the NCRAs. They have invested considerable resources in attempting to obtain new and predictive sources of data. Their ability to do so, however, is greatly constrained. Some industries, such as wireless telecoms and deregulated energy utilities, see data sharing as a threat to profits and will never share data unless compelled to do so. Others that may wish to credit report customer payment data are stymied by confusion over federal law, state prohibitions, and concerns over compliance costs associated with direct consumer disputes. These are all surmountable obstacles and each should be explored given the demonstrated benefits of full-file reporting non-financial payment data (aka proven payment data), which is practiced in over 90 countries globally.[12] Here, the US is not a leader but very much a laggard.

In this same vein, it has further been argued that the NCRAs could solve this asymmetry (e.g. MNOs using full credit reports for eligibility determination, yet reporting very limited tradeline information on their own customers) by enforcing the principle of reciprocity. They are, however, constrained from doing so by their business model and the "voluntary" nature of the national CIS system. Because large wireless telecoms providers are major customers and are limited data furnishers (but large prospective ones), NCRAs have only so much leverage. A CEO at an NCRA who attempted to

[12] The World Bank annually surveys credit bureaus, public credit registries, and central banks concerning the depth of credit information and the coverage of credit data. Included in this survey are questions about non-financial payment data. *See* https://www.doingbusiness.org/en/methodology/getting-credit

enforce the principle of reciprocity would be fired by the Board of Directors after losing a significant revenue stream to their primary competitors.

In fact, this market failure (there is a clear demand for and public interest in further predictive payment data to make lending in the US fairer, more inclusive, and less risky—yet despite this non-financial payment data is grossly undersupplied) can only be corrected through direct government intervention. Increasingly, countries around the world are resorting to credit reporting mandates to overcome this recognized market failure. It is well past time for this discussion to begin in the United States.

Here, laws and regulations must catch up to economic reality. Mobile network operators, cable television service providers, and other media firms extending credit to their customers to purchase equipment are clearly creditors. They are offering installment loans to customers for hundreds and even thousands of dollars, and are not reporting this data to NCRAs. This is quite apart from also not reporting positive payment data for services rendered, yet reporting default and collection data. This unfair and harmful practice must be brought to an end in order to protect consumers, to enable comprehensive and full-file reporting, and to improve the efficacy of the national CIS system. Congress can accomplish this, and should do so with the full support and leadership from the CFPB and the FTC.

Conclusion

We thank the FTC and the CFPB for their leadership on this important set of public policy issues. Forty years of guidance from the FTC and a decade from the CFPB have yielded tremendous progress. Inarguably, the national CIS system is dramatically improved, consumers are better protected, and the financial services sector is safer and sounder than was the case prior to the FCRA.

Still, there remains considerable room for improvement—especially in furthering the development of the national CIS system so that it is fair and inclusive for all Americans, especially the over 40 million Credit Invisibles who struggle to access affordable sources of mainstream credit owing to the hybrid nature of the US credit reporting system—namely, that it is not mandatory and should be; that it is not full-file and should be; and it is not comprehensive and should be.

Toward that end, PERC strongly encourages the CFPB and FTC to consider the following actions:

1. Fund and undertake a rigorous analysis of the accuracy of credit file data as maintained by the NCRAs;
2. Fund and undertake a rigorous analysis of the credit report consumer dispute resolution system;
3. Fund and undertake an assessment of the CFPB consumer dispute portal data, and publish a report on the value and limitations of this data; and,
4. Assess the disconnect between a 50-year old regulatory regime and the current reality regarding blind spots in the national CIS system (MNOs and other large lenders not reporting to NCRAs) and move to rapidly close that gap to the benefit of the majority of Credit Invisibles by moving from a *de facto* to a *de jure* mandatory reporting regime for all substantial lenders.