



February 25, 2008

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex K)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Credit Report Freezes – Comment, Project No. P075420

On behalf of our more than 39 million members nationwide, AARP would like to thank the Federal Trade Commission (FTC) for soliciting comments to assist its efforts as a member of the President’s Identity Theft Task Force.

Security freezes provide consumers with an effective method to protect themselves against new account fraud resulting from identity theft, and AARP believes they should be made available to all consumers. For the security freeze to be as effective as possible, consumers need to freeze their credit report at each of the three national credit bureaus. The number of states with security freeze laws has expanded greatly in the past two years, and the three national credit bureaus each now offer a commercially-developed security freeze option (CDFO) for consumers in states without security freeze laws. However, it is unclear how many consumers are aware of their right to use a security freeze. Consumers also face a number of other potential barriers to using security freezes.

For this reason, AARP conducted a research study to gauge awareness of security freeze laws and determine the number of adult consumers ages 18 and older who have placed a security freeze in seven states.¹ The selected states had laws in effect for at least one year and allowed all consumers to place a security freeze on their credit report. This survey also explored the possible barriers to placing, thawing, and managing a freeze. The total sample of 8,412 respondents in the seven states yields a maximum statistical error of ± 1.1 at the 95% level of confidence and the maximum statistical error for the total sample of 1,200 respondents in each state is $\pm 2.8\%$.² The data were weighted to reflect the actual distribution of age and gender for the population in each state. While significant differences exist between the states as well as between certain demographic groups such as age and income, with respect to most survey question responses, the overall data trends are the same.

Two reports have been produced by and for AARP that discuss the overall findings of the total seven state population of 8,412 respondents: *Barriers to the Use of Security Freeze by Older*

¹ The seven states surveyed were California, Connecticut, Louisiana, Maine, Nevada, New Jersey and North Carolina.

² This means that in 95 out of 100 samples of this size, the results obtained in the sample would be within ± 1.07 or 2.8 percentage points, respectively, of the results obtained had everyone in the population been interviewed.

Consumers and Security Freeze Legislation and Awareness and Incidence of Placement Among Consumers 18+ in Seven States.^{3,4} Both of these reports, as well as a summary of an earlier survey conducted by AARP on consumer attitudes related to security freeze pricing, and a state law chart highlighting key security freeze features, are attached to these comments.

The most recent survey found the following:

Consumers Are Concerned about Becoming Identity Theft Victims

Based on the multi-state survey, it is clear that consumers are very much aware of identity theft and are concerned about becoming an identity theft victim. Overall, 81 percent of consumers indicated they were concerned about becoming a victim of identity theft, with over half of all respondents (55%) saying they were either “extremely” or “very concerned” about becoming a victim. No significant differences by age.

Most Consumers Are Not Aware of Security Freezes

The survey, however, found that less than one-third (31%) of respondents ages 50+ and even fewer younger respondents (27%) indicated they had read or heard that they could block creditors or lenders from using their credit report without the respondents’ permission to establish new credit in their name. Of all respondents indicating they were aware of this fact, 86 percent said they do not know the name of this service. Only 2 percent could provide the term “security freeze,” and an additional 2 percent provided an answer that had the word “freeze” in it. Without knowing the specific name of the security freeze, consumers would likely find it more difficult to locate information about placing a security freeze on their credit reports. No significant differences by age appeared in the survey data.

Consumers Face a Number of Other Barriers to Using a Security Freeze

Sources of Information about Security Freezes

Respondents were asked where, besides the credit bureaus, they would turn for more information about security freezes. More than half (57%) responded that they did not know where they could turn for further information about such freezes. This again suggests that consumers would likely find it more difficult to locate information about placing a security freeze on their credit reports. There were no significant differences by age in the survey results.

Difficulty in Placing a Security Freeze

Nearly half (47%) of all respondents indicated that it would not be easy for them to provide the information each of the credit bureaus requires to place a security freeze and send it to each of the three national bureaus by certified mail as required by most state laws. This would likely deter many consumers from going through the necessary procedures to place a security freeze. Respondents ages 50 and older are slightly more likely than those younger to say they would feel burdened by this process.

³ (2007) Walters, N. AARP Public Policy Institute, Data Digest, Vol. 160.

⁴ (2007) Sauer, J. and N. Walters.

Ability to have a “Rapid Thaw” is Very Important to Consumers

Another barrier identified by the survey was the time it takes consumers to thaw (temporarily lift) the security freeze when they want to unfreeze their credit report to establish new credit. When respondents were asked how important it was to them that they be able to lift the security freeze within 15 minutes of their request, the majority (79%) of all respondents said it was important to be able to do this. Because many of the state laws and the commercially-developed security freeze option do not provide for the rapid thaw, consumers are likely to find a security freeze more burdensome to use and be less likely to place a security freeze. While the majority of respondents in both age groups view a 15 minute thaw as important, younger respondents are more likely than those age 50+ to say so.

Cost of Placing and Thawing a Security Freeze is Important to Older Consumers

Respondents were also asked if their likelihood of signing up for a security freeze might change based on varying fee amounts for placing and thawing. As expected, the proportion of respondents highly likely to place a freeze on their credit files increases as the amount of the fee decreases. The same holds true regarding the amount of fees for thawing the security freeze. In general, all age groups responded similarly to each question regarding the cost of placing and thawing a security freeze (slight statistical differences do appear by age).

Summary of Survey Findings:

The results of this survey indicate that consumers’ primary barrier to using security freezes is that they are largely unaware of the security freeze as a tool to protect themselves against identity theft–related frauds. Few consumers readily recognize the term “security freeze,” which makes it much less likely that they will be able to determine how to block their credit reports. In addition, most respondents do not know where to turn for more information about security freezes, which further reduces the likelihood that they will be able to access this important protection against fraud.

Consumers find the procedures required to place a security freeze at the national credit bureaus to be difficult, and they want to be able to thaw the security freeze quickly so they can establish new credit quickly. Further, consumers are sensitive to the cost of placing and thawing a security freeze and are less likely to use a freeze when either of these is expensive.

AARP Recommendations to Increase the Likelihood of Consumers Using Security Freezes

Based on AARP’s experience advocating for strong security freeze laws in the states, and further informed by the results of these surveys, AARP recommends the following to increase the likelihood that consumers would use security freezes:

- Provide resources for educational campaigns to increase awareness and understanding of security freeze use and provide resources for consumers seeking additional information on security freezes. (While the three major credit reporting agencies – Equifax, Experian and TransUnion – have material on their websites designed to educate consumers about identity theft and the security freeze, much of this is intermingled with material on other

products that they are marketing. However, in addition to other educational campaigns, it would be helpful if the information provided to consumers on the credit reporting agencies' websites was free of advertisements for other products as well as made more complete and thorough regarding the problem of identity theft, the ways consumers can protect themselves without spending money, and, in the case of the security freeze specifically, the importance of this tool in combating new account fraud and the specific information consumers would need to easily place, temporarily lift or permanently remove a freeze. In addition, it would be useful if the FTC and other government agencies included this information on their websites as well.)

- Adoption of state and federal legislation to allow all consumers in every state to easily place a security freeze at minimal or no cost.
- Simplify consumers' ability to place a security freeze on their credit reports by using a secure electronic or phone application process.⁵ Requiring sending of financial and personal documentation to each of the three national bureaus by certified mail is difficult for many consumers and makes them less likely to use security freezes.
- Allow consumers to thaw the security freeze on their credit reports rapidly so they can obtain credit in a timely manner.
- Institute ongoing research to track awareness and incidence of the security freeze law as well as assess the effectiveness of public outreach efforts to increase security freeze placement.

Conclusion

Thank you again for this opportunity to submit these comments. We look forward to working with the FTC as it considers ways to improve identity theft protections for consumers.

Sincerely,

David Certner
Legislative Counsel and Legislative Policy Director
Government Relations and Advocacy

⁵ For example, Minnesota and North Dakota allow consumers to place a security freeze by using a toll-free number.

APPENDIX A

Barriers to the Use of Security Freezes by Older Consumers

Most states have passed “security freeze” laws allowing consumers to shield their credit reports from identity thieves. A new AARP survey shows older consumers are largely unaware of the existence of this important protection, and would be more likely to take advantage of security freezes if the process of placing and using the freeze was easier and less costly.

Introduction

Identity theft–related fraud continues to dominate the Federal Trade Commission’s (FTC) list of top frauds.¹ One recent national study estimated that 15 million Americans were victimized by identity theft–related fraud in the 12 months ending in mid-2006.² As a result, preventing identity theft and related frauds has been a top priority for consumer advocates, lawmakers, and regulators.

State legislators in particular have been passing laws designed to help protect consumers from these crimes. These laws have focused primarily on two areas of consumer protection. One group of laws mandates notifying consumers when an information security breach at a business or other covered entity places consumers’ sensitive personal information at risk of use by identity thieves. As of the writing of this report, 34 states have passed laws related to security breach notification.³

A second group of laws provides security freezes that allow consumers to block access to their credit reports to prevent identity thieves from using stolen personal

information⁴ to establish new credit in the victim’s name. This is achieved by issuing a unique passcode to a consumer who requests a security freeze. Because most businesses do not open new credit accounts without first examining a consumer’s credit report, the security freeze will block any identity thief who has acquired a victim’s personally identifiable information, but does not know this passcode. For the security freeze to be as effective as possible, consumers should freeze their credit report at each of the three national credit bureaus.

As of the writing of this report, 39 states and the District of Columbia have passed laws allowing consumers to place a security freeze on their credit reports.⁵ While three of these state laws limit availability of security freezes to identity theft victims only, the other states allow any consumer to proactively place a security freeze on their credit reports.

The number of states with security freeze laws has expanded greatly in the past two years, but it is unclear how many consumers in states with such laws are aware of their right to use a security freeze. Consumers also face a number of other potential barriers to using security freezes. This report gauges awareness of security freezes among consumers age 50 and older and identifies potential barriers to the use of such freezes.

¹ Federal Trade Commission. (2007, February). *Consumer Fraud and Identity Theft Complaint Data—January–December 2006*.

<http://www.consumer.gov/sentinel/pubs/Top10Fraud2006.pdf>

² Gartner Research press release. (2007, March 6). *Gartner Says Number of Identity Theft Victims Has Increased More Than 50 Percent Since 2003*.

<http://www.gartner.com/it/page.jsp?id=501912>

³ A list of states that have security breach notification laws is available at:

<http://www.pirg.org/consumer/credit/statelaws.htm#breach>.

⁴ This could include information such as Social Security number, date of birth, mother’s maiden name.

⁵ A list of states that allow consumers to place security freezes on their credit reports is available at:

http://www.consumersunion.org/campaigns/learn_more/003484indiv.html.

Methodology

AARP selected a number of states in which to conduct a survey to measure consumers' awareness of the availability of security freezes and to identify potential barriers to placing and using a security freeze.

The states were selected based on two criteria:

1. The state allowed all consumers to proactively place a security freeze on their credit report.
2. The security freeze law had been in effect for at least one year before the date of the survey.

The seven states that met these criteria are listed in Table 1.

Table 1: States Surveyed

State	Fees*	Effective Date
California	ID theft victims: none; Others: \$10 to place freeze, \$10 for temporary global thaw of freeze, \$12 for temporary thaw of freeze for one creditor	January 2003
Connecticut	\$10 to place, lift, or thaw; \$12 to thaw for one creditor	January 2006
Louisiana	ID theft victims and residents age 62 or older: none; Others: \$10 to place, \$8 to thaw	July 2005
Maine	ID theft victims: none; Others: up to \$10 to place, remove, thaw, have PIN reissued, \$12 for thaw for a specific creditor	February 2006
Nevada	ID theft victims: none; Others: up to \$15 to place, \$18 to thaw, \$20 to thaw for one creditor	October 2005
New Jersey	None for initial freeze, \$5 to remove, thaw, or have PIN reissued	January 2006
North Carolina	ID theft victims: none; Others: \$10 to place, remove, or thaw	December 2005

*As of the survey date

A random digit dialing process was used to create a representative sample of adults age 18

and older. The survey was conducted during April and May 2007 and had a total sample of 8,412 respondents.⁶ Each of the seven states had at least 1,200 completed interviews. The resulting data were weighted to reflect the actual distribution of age and gender for the population. While survey responses were generally similar across age groups, this report discusses only the responses of older consumers (age 50 and older).

Findings

Older Consumers Are Concerned about Becoming an Identity Theft Victim

The survey found that most older consumers are concerned about identity theft. Overall, 81 percent of older consumers indicated they were concerned about becoming a victim of identity theft, with over half of all respondents (55%) saying they were either “extremely” or “very concerned” about becoming a victim.

Most Older Consumers Are Not Aware of Security Freezes

The survey found that less than one-third of respondents (31%) indicated they had read or heard that they could block creditors or lenders from using their credit report without the respondents' permission to establish new credit in their name. Of the respondents indicating they were aware of this fact, 88 percent said they do not know the name of this service. Only 2 percent could provide the term “security freeze,” and an additional 2 percent provided an answer that had the word “freeze” in it. Without knowing the specific name of the security freeze, consumers would likely find it more difficult to locate information about placing a security freeze on their credit reports.

Respondents who indicated they were not aware that they could block their credit report from being used to establish new credit without their permission were read a series of names of identity theft protection services. Based on this list, 3 percent of these respondents identified the term “security

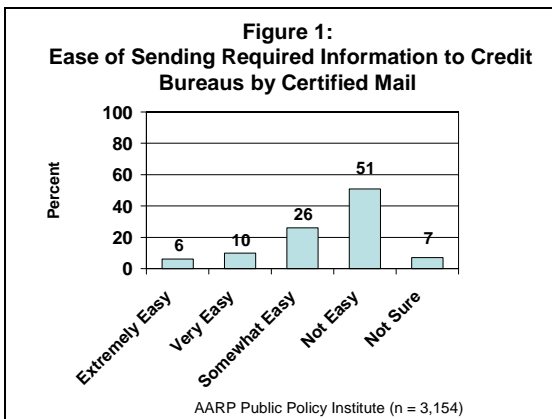
⁶ The sample yields a maximum statistical error of ± 1.07 percent at the 95 percent level of confidence.

freeze” as being familiar to them. This suggests that, although these respondents may have heard the term “security freeze,” they did not understand how the security freeze works and why it would protect them from identity theft–related fraud.

Older Consumers Face a Number of Other Barriers to Using a Security Freeze

Respondents were asked where, besides the credit bureaus, they would turn for more information about security freezes. More than half (57%) responded that they did not know where they could turn for further information about such freezes. For those who could think of a place they would consult for more information, 30 percent said they would turn to their bank or credit union.

In addition, most respondents indicated that it would not be easy for them to provide the information credit bureaus require to place a security freeze⁷ and send it to each of the three national bureaus by certified mail as required by most state laws (Figure 1).

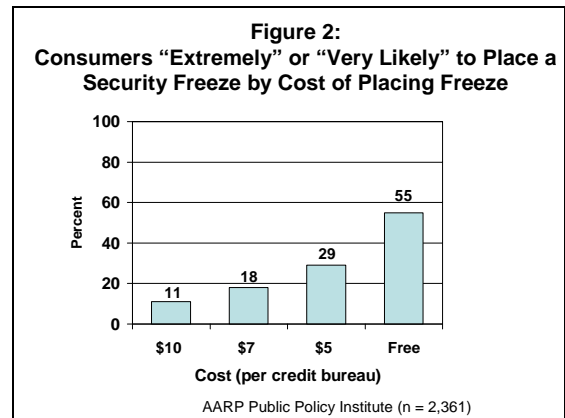


⁷ Credit bureaus typically require consumers to provide the following information when requesting a security freeze: full name and address; Social Security number; date of birth; a copy of a government-issued identification card (such as a driver’s license); a copy of a utility bill, bank statement, or other proof of address; and payment information (when a fee is associated). Identity theft victims must also include a copy of a police report or an identity theft affidavit to verify their claim.

Another barrier identified was the time it takes consumers to thaw (temporarily lift) the security freeze when they want to unfreeze their credit report to establish new credit. When respondents were asked how important it was to them that they be able to lift the security freeze within 15 minutes of their request, two-thirds (66%) said it was important to be able to do this. As of the time of the survey, none of the states surveyed required these “rapid thaws”; rather, they required consumers to wait several days before a thaw would take effect and they could establish new credit.⁸

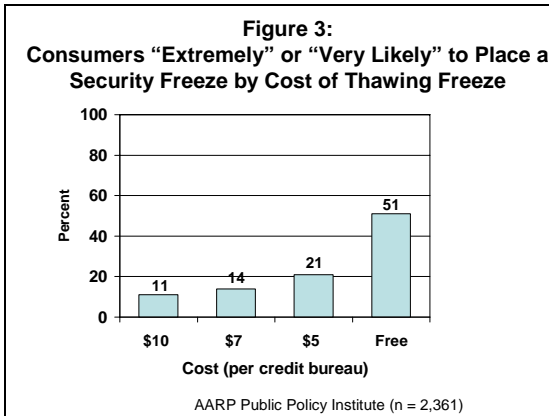
Cost of Placing and Thawing a Security Freeze is Important to Older Consumers

Respondents were asked about the likelihood of their placing a security freeze based on the cost of placing the freeze. As the cost of placing the security freeze declined, the number of consumers indicating they would be likely to place a security freeze increased (Figure 2).



Similarly, respondents indicated they were more likely to place a freeze as the cost of thawing the freeze to obtain new credit declined (Figure 3).

⁸ A rapid thaw of a security freeze (within 15 minutes of the consumer request) could be accomplished by using a toll-free phone number or secure Internet connection that uses appropriate security measures. Currently, consumers nationwide are able to use these methods to request a copy of their credit report.



Summary

The results of this survey indicate that older consumers’ primary barrier to using security freezes is that they are largely unaware of the security freeze as a tool to protect themselves against identity theft–related frauds. Few older consumers readily recognize the term “security freeze,” which makes it much less likely that they will be able to determine how to block their credit reports. In addition, most respondents do not know where to turn for more information about security freezes, which further reduces the likelihood that they will be able to access this important protection against fraud.

Older consumers find the procedures required to place a security freeze at the national credit bureaus to be difficult, and they want to be able to thaw the security freeze quickly so they can establish new credit quickly. Further, older consumers are sensitive to the cost of placing and thawing a security freeze and are less likely to use a freeze when either of these is expensive.

Recommendations

Legislators and regulators can take a number of actions to make security freezes easier for consumers to use. These include:

- Provide resources for educational campaigns to increase awareness and understanding of security freeze use and provide resources for consumers seeking additional information on security freezes.

- Keep the cost of placing and thawing security freezes low to encourage more consumers to use the important protections such freezes provide.
- Make it easier for consumers to place a security freeze on their credit reports by using a secure electronic or phone application process.⁹ Requiring them to send financial and personal documentation to each of the three national bureaus by certified mail is difficult for many consumers and makes them more likely not to use security freezes.
- Allow consumers to thaw the security freeze on their credit reports rapidly so they can obtain credit in a timely manner.

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⁹ For example, Minnesota and North Dakota allow consumers to place a security freeze by using a toll-free number.

APPENDIX B



Security Freeze Legislation: Awareness and Incidence of Placement Among Consumers 18+ in Seven States

By Jennifer H. Sauer and Neal Walters

November 2007

Executive Summary

Given that security freezes are a fairly recent development (with most laws passed over the last four years) and that they have, until fairly recently, only provided a small fraction of the population access to the service, it is safe to presume that very few people today have a security freeze placed on their credit files. However, the actual number of people who currently have placed a security freeze has not been made publicly available by the credit bureaus. In spring 2007, AARP conducted a research study to gauge awareness of security freeze laws and determine the number of adult consumers ages 18 and older who have placed a security freeze in seven states. The selected states had laws in effect for at least one year and allowed all consumers to place a security freeze on their credit report. This survey also explored the possible barriers to placing, thawing, and managing a freeze.

The survey found that *both awareness of security freeze laws and the incidence of placing a security freeze are very low across all states*. Moreover, the data suggest that information on how to place a freeze, the fees associated with placing or lifting a freeze, and the process involved in placing or lifting a security freeze may be barriers to consumers actually taking this protective measure. **In all, this survey yields three major recommendations:** 1) consumer organizations and advocates should heighten consumer education and information efforts; 2) state and federal legislation should be pursued to allow all consumers in every state to easily place a security freeze at minimal or no cost; 3) ongoing research should be instituted to track awareness and incidence of the security freeze law as well as assess the effectiveness of public outreach efforts to increase security freeze placement. **Methodology:** The total sample of 8,412 respondents yields a maximum statistical error of ± 1.1 at the 95% level of confidence.¹ The data were weighted to reflect the actual distribution of age and gender for the population in each state.

Highlights from the survey include:

- Concern about becoming a victim of identity theft is high among all respondents – over half (54%) are extremely or very concerned and another quarter are somewhat concerned (26%). Yet actual self reporting of any misuse of their credit or checking accounts (15%) or other personal information like a Social Security number (5%) without their permission is very low.
- The majority of respondents did not know or were not sure of their right to block others from reviewing their credit files (62%) or of national credit bureaus being required to provide them the opportunity to block others from reviewing their credit files (71%).
- On an unaided basis, less than 3 percent of all respondents recognized that the law included the term ‘freeze’, but less than 1 percent actually identified the correct name as ‘security freeze’.
- Overall, the survey suggests that less than 1 percent of all respondents currently have a security freeze placed on their credit files.

For more information about this survey, please contact Jennifer H. Sauer at 202-434-6207 or jsauer@aarp.org.

¹ This means that in 95 out of 100 samples of this size, the results obtained in the sample would be within ± 1.07 or 2.8 percentage points, respectfully, of the results obtained had everyone in the population been interviewed.

Background

Identity theft-related fraud is still the top complaint category in the Federal Trade Commission's (FTC) list of top consumer frauds, and they estimate that approximately 10 million Americans are victims of this crime each year.² Additionally, the FTC data showed that over three-quarters of complaints regarding identity theft were made by people younger than 50 years old, and only 16 percent of such complaints were made by people ages 50 to 64. While fewer complaints of identity theft came from people age 65 or older, the FTC points out that older persons and those less educated are likely to take longer to report identity theft and are less likely to report it at all. In addition, a survey of adults nationwide age 18 and older, found older consumers to be disproportionately more vulnerable and susceptible to unfair or deceptive business practices – adults age 75 and older are twice as vulnerable to identity theft than those ages 65 to 74, and three times more vulnerable to this type of crime than those younger than 65. This survey also found that people aged 50 to 64 were more likely than either those younger or older to feel they have been a fraud victim.³

Identity theft is costly to retailers, businesses, and consumers. While the National Institute of Justice reports that the actual cost of identity theft to business and consumers is still generally unknown, other sources estimate the loss to business be anywhere between \$17 and \$50 billion, and the loss to individuals to be about \$5 billion.^{4,5} In fact, the FTC estimated that consumers who experienced new account ID theft spent an average of \$1,180 to deal with the problem and about \$610 on theft around an existing account. The FTC notes that the cost to business was much higher - \$10,200 in new accounts and \$2,100 in existing misused accounts, respectively.⁶ Moreover, they report, identity theft has been shown to cost U.S. consumers about 297 hours in trying to resolve the problems caused by this crime.

Given the serious security, financial, and personal losses produced by identity theft, both federal and state policies to protect consumers from this crime have been implemented, such as security breach notification laws in about 34 states, the Federal Fair and Accurate Transactions Act of 2003, and security freeze legislation in 39 states and the District of Columbia. In particular, the security freeze legislation provides consumers with an opportunity to protect themselves rather than depending on requirements that businesses offer some form of information or assistance.

Security freeze legislation requires the three major credit bureaus – Equifax, Experian, and TransUnion – to allow consumers the opportunity to close their credit files from view by a third party without their consent or authorization, essentially locking it up so that potential creditors can not look at it, thus freezing out identity thieves. This service would keep identity thieves from opening new credit lines in the name of a potential victim, even if the thief has the victim's full name or Social Security number. The consumer has the ability to lift the freeze at any time. Some state laws include allowing the credit bureaus to charge consumers fees to place and thaw the freeze, or exempt identity theft victims from paying any fees altogether.

² Federal Trade Commission, *Consumer Fraud and Identity Theft Complaint Data: January – December, 2006*.

³ AARP, *Consumer Behavior, Experiences and Attitudes: A Comparison by Age Groups*. March 1999.

⁴ National Institute of Justice (NIJ), *Identity Theft – A Research Review*; an online publication based *Identity Theft Literature Review* by G.R. Newman and M.M. McNally; <http://www.ojp.usdoj.gov/nij/publications/id-theft/welcome.htm>.

⁵ Walters, N., *Identity Theft: An Update on the Experience of Older Complaints*. 2004 AARP Public Policy Institute, Data Digest number 102.

⁶ ConsumersUnion.org, Identity Theft Fact Sheet, 2007, http://www.consumersunion.org/campaigns/financialprivacynow/2007/04/fact_sheet_about_id_theft_1.html, Source: Federal Trade Commission - Identity Theft Survey Report, Federal Trade Commission. September 2003.

Currently, all but 11 states have passed security freeze laws – Alabama, Alaska, Arizona, Georgia, Idaho, Iowa, Michigan, Missouri, Ohio, South Carolina, and Virginia. Four states, Arkansas, Kansas, Mississippi, and South Dakota, have security freeze laws limited to identity theft victims.⁷ However, as of November 1, the three major credit bureaus voluntarily made a security freeze available to consumers in all states. While they will not charge any fees to victims of identity theft, non-victims will be asked to pay each credit bureau they sign up with \$10 to initiate the freeze and \$10 to lift it temporarily or remove it altogether, unless state law mandates a lower fee.⁸ All three credit bureaus require consumers to initiate the security freeze by making a request by mail. Experian enables consumers to thaw the freeze by making a request online or by phone, while Equifax and TransUnion allow consumers to thaw the freeze by phone or by mail, but the request can take up to three days before going into effect (unless state law provides for a faster thaw).

Given that security freezes are a fairly recent development with most laws passed over the last four years (some not even in effect yet) that only provided access to the service to a fraction of the population, it can be safely presumed that very few people today have a security freeze placed on their credit files. However, the actual number of people who currently have placed a security freeze has not been made publicly available by the credit bureaus. While the offer by the big three credit bureaus to extend security freezes to all consumers should be commended, it is still not a law and can be withdrawn at any time.

Purpose of this survey

In March 2007, AARP engaged Alan Newman Research, Inc. (ANR) to conduct a research study among residents ages 18 and older in seven states about new laws that require the national credit bureaus to block creditors or lenders from using consumers' credit information to establish new credit in their name without their permission. The purpose of the survey was to gauge awareness of security freeze laws and determine the placement of a security freeze among adult consumers in seven states where the laws had been in effect for at least one year and that allowed all consumers to place a security freeze on their credit report. This survey also explored the possible barriers to placing a freeze, the possible preferences for initially setting up a freeze and later managing that freeze, and self-reports and concerns about identity theft.

⁷ ConsumersUnion.org, *Powerful Identity Theft Safeguard Will Be Available Nationwide by November 1, Consumer Groups Urge Credit Bureaus to Make "Security Freeze" More Affordable and Easier to Use*, October 2007, http://www.consumersunion.org/pub/core_financial_services/004941.html.

⁸ For a security freeze to be completely effective, consumers have to place a freeze with all three credit reporting agencies. This is because a potential creditor may use any of the three bureaus to check a consumer's creditworthiness. Thus, all three have to be frozen to get the maximum protection from the risk of new account identity theft.

Methodology

Between April 1 and May 6, ANR completed 8,412 interviews with adults, aged 18 and older, living in California, Connecticut, Louisiana, Maine, Nevada, New Jersey, and North Carolina – 1,200, or slightly more, interviews in each state. Selection of the states were based on two criteria: 1) the state allowed all consumers to proactively place a security freeze on their credit report, and 2) the security freeze law had been in effect for at least 1 year before the date of the survey. The sample was generated using a random digit dialing process designed to reach all households in each state respectively with telephone service. The total sample of 8,412 respondents yields a maximum statistical error of ± 1.1 at the 95% level of confidence. The maximum statistical error for the total sample of 1,200 respondents is $\pm 2.8\%$ at the 95% level of confidence.⁹ The data were weighted to reflect the actual distribution of age and gender for the population in each state.¹⁰ ***While significant differences exist between the states with respect to most survey question responses, the overall data trends are the same. Therefore, this report will discuss overall findings of the total seven state population of 8,412 respondents.***

Some questions may exceed 100% due to rounding or the use of multiple response question formats. The total N and subgroup n's may appear to not add up accordingly from question to question due to multiple criteria established for different groups or types of respondents to move from one question to another. Please contact the author for a copy of any individual states' annotated survey.

⁹ This means that in 95 out of 100 samples of this size, the results obtained in the sample would be within ± 1.07 or 2.8 percentage points, respectfully, of the results obtained had everyone in the population been interviewed.

¹⁰ Weight values ranged from a low of 0.38 to a maximum of 2.21. The average weight value was 1.17.

States Surveyed and their Security Freeze Laws

State	Fees per Credit Bureau <i>at time of survey</i>	Effective date of Security Freeze
California	ID theft victims: \$0 All others: \$10 to place \$10 to thaw each account for a period of time \$12 to thaw each account for a specific creditor Los Angeles: \$0 to remove	January 2003
Connecticut	All consumers: \$10 to place, remove, thaw \$12 to thaw each account for a period of time	January 2006
Louisiana	ID theft victims: \$0 Consumers age 62+: \$0 All others: \$10 to place \$8 to thaw each account for a period of time	July 2005
Maine	ID theft victims: \$0 All others: \$10 to place, remove, thaw, or have PIN reissued. \$12 to thaw each account for a specific creditor	February 2006
Nevada	ID theft victims: \$0 All others: \$15 to place \$18 to thaw each account for a period of time \$20 to thaw each account for a specific creditor	October 2005
New Jersey	All consumers: \$0 for initial freeze \$5 to remove, thaw, or have PIN reissued	January 2006
North Carolina	ID theft victims: \$0 All others: \$10 to place, remove, thaw all or one account.	December 2005

* A **'thaw'** refers to a temporary action enabling a creditor to view a consumer's report for new account/loan purposes; **'removal'** refers to consumers choosing to no longer have a security freeze at all.

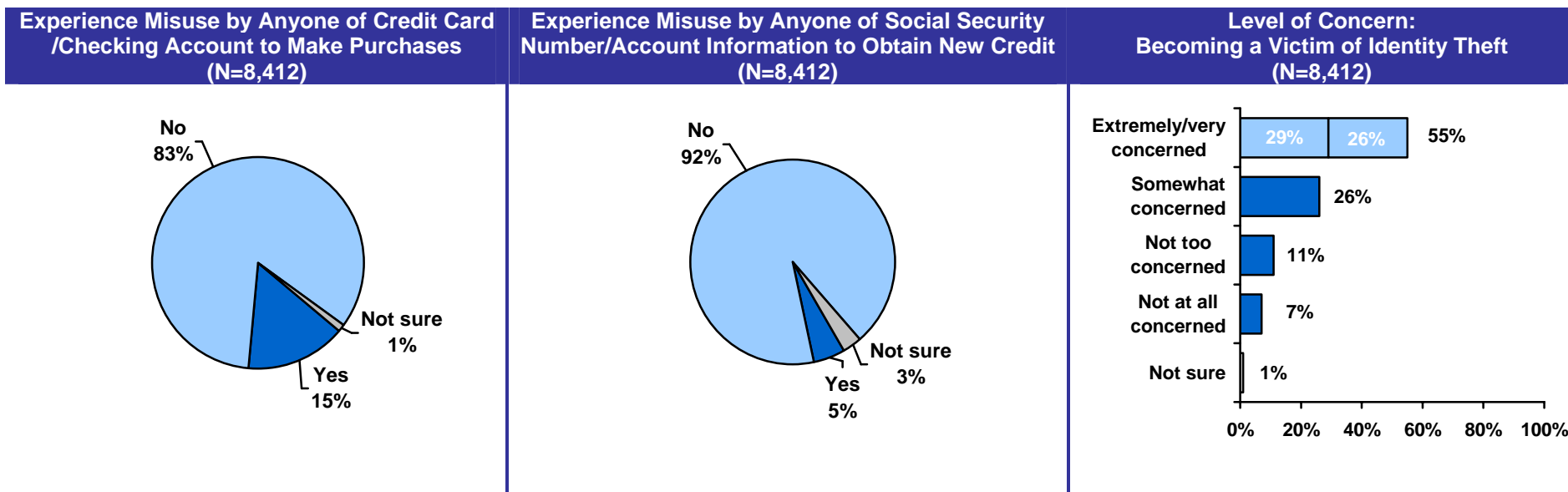
**Today, in NV, it now costs \$0 for people 65+, and for all other consumers it costs \$10 to place, thaw, and remove.

KEY FINDINGS

Respondents across all states show high concern about identity theft, yet few say they have experienced it.

Between March 1, 2006, and April 1, 2007 – the 12 months preceding the fielding of this survey – some 59 million records (or twenty percent of the current U.S. population) containing the personally identifiable information of consumers were exposed as a result of 390 publicly disclosed breaches in the United States.^{11,12} Moreover, according to Consumers Union.org, scores of Americans have been affected by security breaches in just the past two years, or since ChoicePoint sold the Social Security numbers and personal data of more than 160,000 people to professional thieves.¹³ Data from this survey show that one in five (20%) respondents say they received a letter from their bank, credit union or other financial institution, or a retailer or other business alerting them to a breach in security or release of their personal or financial information (see Annotated Survey, Question 33). Combined with growth in computer and internet use among businesses and consumers, security breaches have certainly heightened the sense of concern for personal and financial data security.

Data from this survey show that concern about becoming a victim of identity theft is high among all respondents across all states – over half are extremely or very concerned and another quarter are somewhat concerned. Yet actual self reporting of any misuse of their credit or checking accounts or other personal information that would be necessary to make purchases or open new credit without their permission is very low. Likewise, few respondents indicate fraudulent misuse of their credit or checking account than of their Social Security number or other account information.



¹¹ An AARP analysis of Attrition.org, Data Loss Archive and Database – Open Source, <http://attrition.org/dataloss/dldos.html>.

¹² While the current U.S. Census reports of over 303 million people includes children, many of these breaches included health, employment, or insurance records that may have also included the personally identifiable information of children.

¹³ ConsumersUnion.org: 109th Congress Fails American Consumer; Vital Health, Privacy, Pocketbook Issues Ignored, September 28, 2006; www.consumersunion.org/pub/2006/09/003772print.html.

Data from this survey strongly suggest that across the seven states, both awareness of security freeze laws and the incidence or action of placing a security freeze are remarkably low.

Because of the newness and probable uncertainty about what security freezes are and do, a series of aided and unaided questions were designed to capture the awareness of security freeze and determine how many are most likely to have one placed on their credit files

To begin, all respondents in each state were asked if they knew they had the right to block creditors, lenders, or other businesses from reviewing their personal credit report or files in order to establish new credit in their name without their permission. Following this question, respondents were then asked if they had ever heard of or read about the national credit bureaus being required to provide consumers like themselves such an opportunity to block others from establishing new credit in their name. The majority of respondents across all states either did not know or were not sure if they had heard of this right, nor of this opportunity.

Know of Legal Right to Block Others from Reviewing Personal Credit Files to Establish New Credit w/o Consumer Permission (N=8,412)			Ever heard of National Credit Bureaus Required to Provide Consumers Opportunity to Block Credit Files From Others (N=8,412)	
		38%	Yes	28%
		42%	No	67%
Yes	Not sure	20%	Not sure	4%
No				

Among those respondents who say they have heard or read about the national credit bureaus being required to provide consumers the opportunity to freeze their credit files (n=2,390), the majority say they do not know the name of this service. Only 2 percent of these respondents who indicate they are aware of the law, are actually able to correctly say, unaided, that this opportunity is called a ‘security freeze’. Another 1 percent called it a credit freeze, and 3 percent provided some other name for the law or service that included the word ‘freeze’. Two percent mistook it for a fraud alert, and another five percent gave a name for the law that did not include the term ‘freeze’ at all. So, among the total population, only .006 percent correctly identify security freeze on an unaided basis, and only 2 percent recognize that the law included the term ‘freeze’.

<u>Unaided</u> Identification of Security Freeze Among Respondents Indicating Awareness of Service/Law (weighted n=2,390)		
“Security Freeze”	2%	56
“Credit Freeze”	1%	29
“Freezing Credit”	<.5%	6
“Credit report Freeze”	1%	16
“Credit file freeze”	0	1
Any other word (s) “freeze”	1%	19
Fraud alert	2%	46
Other – not using term “freeze”	5%	107
Do not know name	86%	2061

**Aided Identification of Security Freeze Among
Respondent NOT Aware of Service/Law
(weighted n=7,782)**

Fraud Alert	18%
Financial Protection Service	9%
Credit Report Block	4%
Security Freeze	3%
Not sure	61%

Similarly, among those respondents who indicate having *not* heard or read about the major credit bureaus being required to offer consumers the opportunity to block their credit files from review, only 3 percent of them correctly identified security freeze when aided with a list of plausible names for this service. Nearly one in five mistook it for a fraud alert, and another thirteen percent thought it was called a credit report block or a financial protection service. Again the majority is not sure what the service or law is called.

Given the low familiarity with the security freeze law and service, it is not surprising that ***less than 1 percent of all respondents across the seven surveyed states indicate they currently have a security freeze placed on their credit files.***¹⁴ In an attempt to further gauge the chances of actually having a freeze placed on their credit files, those who indicated they have a security freeze placed were asked how easy it was for them to place a freeze on their credit files. Most of these respondents report that it was easy for them (Extremely easy: 24%; Very easy: 29%; Somewhat easy: 25%) (see Annotate Survey, Question 6c). This is particularly interesting given that the current process for placing a freeze does seem notably time consuming and cumbersome.

A further attempt to gauge their awareness of the security freeze law and their actual placement of a security freeze included asking those who indicated awareness of the law and having placed a freeze how much the service cost in their state. An overwhelming ***majority report they are unsure*** of how much the credit bureaus charge residents to sign up to (76%) or thaw (85%) the freeze their files.¹⁵

Among the majority of respondents indicating awareness of the security freeze law but who *do not* have a freeze placed, just under half say they are not sure why, and others give varied reasons for not doing so such as haven't gotten around to it (15%); never heard of it (7%)¹⁶; doesn't seem like it would work (4%); fees too high (3%); seems complicated (2%); other reasons not able to categorize (21%). Of these respondents, over half (55%) indicate they are not likely to sign up with a national credit bureau to place a freeze on their files, leaving only sixteen percent who say they would be extremely (5%) or very likely (11%), and one-quarter who would be somewhat likely (24%) to sign up (see Annotated Survey, Question 6b).

¹⁴ This proportion is determined by the number of people who only recalled the name of the law or at least used the term 'freeze' in their recall of it. At the time of this survey, 556 people indicated they had a security freeze placed on their credit files. While roughly a quarter of those in each state who recognized the name or at least part of the name of the law say they have a freeze placed on their credit files, translated to the total population in the study as well as in each state, this equals less than 1 percent. See questions 1 through 6c in annotated survey.

¹⁵ A final effort to determine the incidence of security freeze among residents of these seven states was introduced later in the fielding stage of the survey. Due to the fielding schedule, most states respondents were not asked the question regarding the issuance of a PIN number from the credit bureaus. Among the very few respondents who were asked the question, over half of them said they were not issued a PIN number. These respondents, therefore, most likely did not have a security freeze placed, but rather likely either had a fraud alert, some other credit related service, or were confusing this with some other product or service. The number of respondents asked this question is too small to generalize to entire sample.

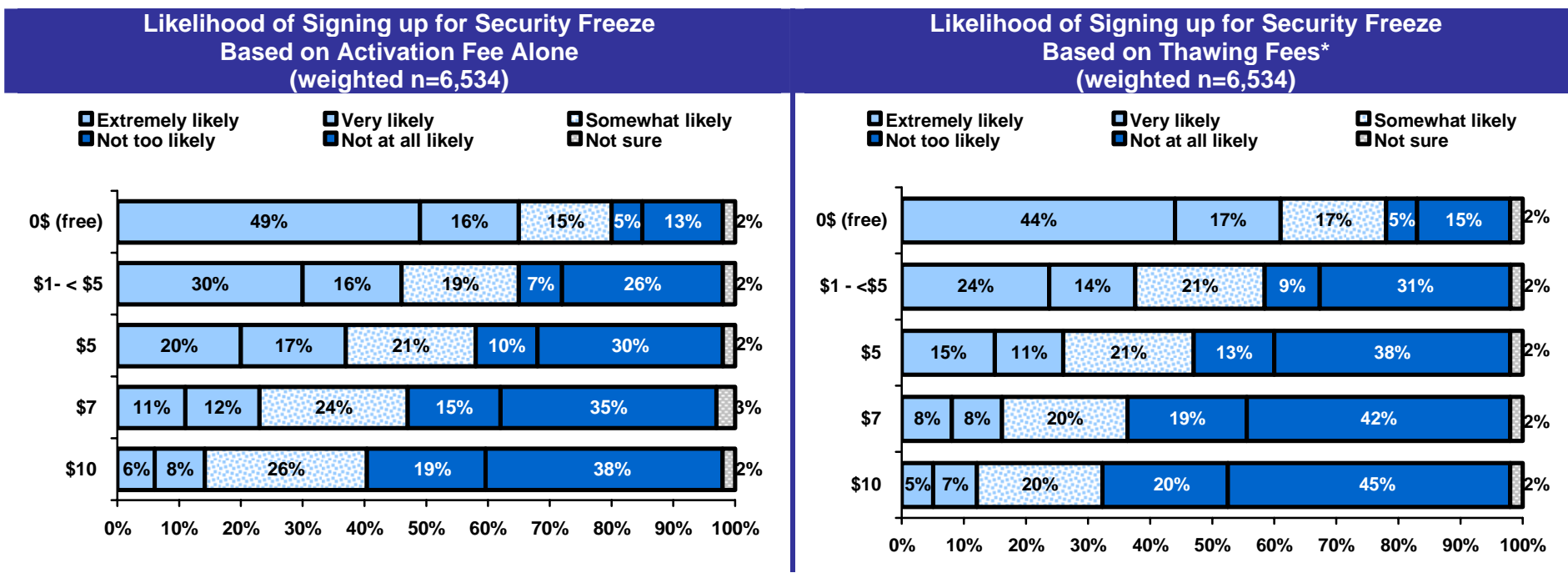
¹⁶ As expected, even though some respondents may have indicated awareness, this follow-up question allowed yet another opportunity to capture those truly not aware of security freeze and skip them to questioning designed for all respondents unaware of security freeze – Q. 16.

Potential Barriers to Placing a Security Freeze:

Cost

After hearing a very general and broad description of the security freeze law without any mention of fees or costs, about two in ten of those respondents across all seven states who are unaware of the law say they are highly likely to sign up for the service (Extremely likely: 7%; Very likely: 10%). Another quarter of them say they would be somewhat likely to sign up for a security freeze (24%), and nearly four in ten are not likely to do so (Not very likely: 20%; Not at all likely: 33%) (see Annotated Survey, Question 16). Interestingly, when initially asked *to consider* whether a \$10 placement fee with each of the three major credit bureaus is a reasonable fee or not, over half (55%) say think this amount is reasonable. However, when next asked how likely they would be to sign up to place a freeze if they had to pay \$10 to each credit bureau, only 14 percent say they would be extremely or very likely to do so – considerably larger proportions say they would be unlikely to place a freeze for this fee amount.

Respondents were also asked if their likelihood of signing up for a security freeze might change based on varying fee amounts for placing and thawing. As expected, the proportion of respondents highly likely to place a freeze on their credit files increases as the amount of the fee decreases. The same holds true regarding the amount of fees for thawing the security freeze. This data coincides with a 2006 AARP study.¹⁷



*Assuming activation fees – respondent not asked to think otherwise.

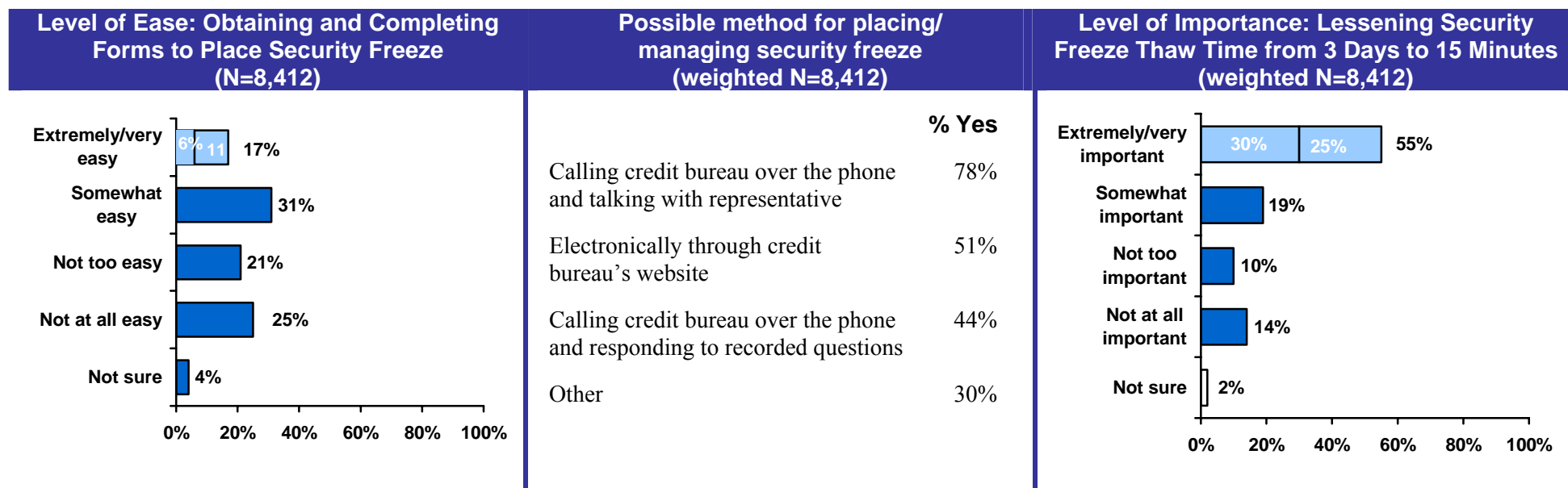
¹⁷ AARP (2006) *Security Freeze Legislation: Consumer Attitudes on Paying Activation and Lifting Fees; An AARP Survey of Residents 18+ in Delaware, Oklahoma, South Carolina* http://www.aarp.org/research/frauds-scams/fraud/credit_freeze.html .

Process

Credit bureaus typically require consumers to provide any number or combination of personal identification sources in addition to their full name and address – their Social Security number, date of birth, copy of a government-issued identification card or drivers license, copy of a utility bill, bank statement, or secondary proof of address, and payment information in the case of associated fees. Identity theft victims must include a copy of the police report or affidavit verifying their claim.¹⁸ As of the writing of this report, this is still the process for all consumers in all states. When broadly informed of this process, only about two in ten respondents across all states say it would be/is extremely or very easy for them to do, while almost half say is not easy, and less than one-third feel it is somewhat easy.

It is not surprising then that the majority of respondents across all states indicate a preference for placing or simply managing their security freeze by being able to call a credit bureau and talk with a representative. Half would like to place a freeze or manage their freeze electronically through the credit bureau’s website. Still, about four in ten would not mind calling a credit bureau and responding to a recording, and less than one-third provided other possible modes of communicating their needs with respect to a security freeze.

Also at the time of this survey, each of the state laws allowed the credit bureaus up to three days in which to thaw a consumer’s freeze on their file for a creditor or lender. When asked how important it would be to have this time frame reduced to 15 minutes, the response is not surprising – over half say it would be extremely or very important to them, and another one in five say it would be somewhat important. Yet, one quarter indicate this shortened time for thawing a freeze is not important to them. As of today, none of these states laws has implemented a 15 minute thaw.



¹⁸ Walters, N., *Barriers to the Use of Security Freezes by Older Consumers*. 2007 AARP Public Policy Institute Data Digest. *Security Freeze Legislation: Awareness and Incidence of Placement Among Consumers 18+ in Seven States*

Sources of Information

One would expect that the increase in publicity around identity theft in at least the past decade would certainly contribute to a heightened awareness of the crime among consumers today as well as an increase in information on where to seek help or how to prevent identity theft. Yet, the data from this survey clearly shows that the majority of residents across all states are not sure where they can go in their community to find information about placing a freeze on their credit files. Among all respondents, over half (57%) simply say they are not sure, while one-quarter (23%) say they would turn to their bank, and five percent or less say they would turn to a credit union (5%), the local library (3%), or the police department (2%) (see Annotated Survey, Question 25).

What can AARP and other consumer organizations do to combat identity theft?

Inform, Inform, Inform!

Continued and heightened efforts by consumer organizations and advocates to increase awareness among consumers, businesses, and lawmakers may bring about individual action to prevent victimization from this crime. This data strongly indicates that most consumers need to learn about the security freeze law as a preventative measure to becoming a victim of new account identity theft. In those states with laws they need to understand that it is a right they have under their state's law, it is different from other credit protection products, and how to place it. Indeed, over six in ten (62%) do not know or are not sure they have a right to block creditors and others from reviewing their personal credit reports to establish new credit in their name without their permission, and over half (59%) have never contacted any of the three national credit bureaus to request a copy of their credit report (see Annotated Survey, Questions 1 and 2).

The data also shows a tremendous need for information on where to turn and what to do if faced with identity theft. Among those respondents who report a misuse of their credit cards or checking accounts and among those who report a misuse of their Social Security number or other account information, unaided, just 3 percent or less percent say they would contact the FTC or an Attorney General's office.

Where Potential Victims of Identity Theft Reported Misuse of Credit Card/Checking Account (weighted n=1,099 respondents 18+)		Where Potential Victims of Identity Theft Reported Misuse of Social Security Number/Other Account Info (weighted n=316 respondents 18+)	
Bank or credit union	45%	Bank or credit union	27%
Credit card company	38%	Credit card company	20%
Police	20%	Police	37%
Family/friends	3%	Family/friends	7%
Better Business Bureau	2%	Better Business Bureau	4%
State Attorney General/State consumer agency/Securities Commission	1%	State Attorney General/State consumer agency/Securities Commission	3%
Federal Trade Commission	1%	Federal Trade Commission	1%
Other	12%	Other	31%

Lobby for Consumer Friendly Security Freeze Laws

Consumer organizations should continue to pursue state and federal legislation that will allow all consumers in every state and United States territory the opportunity to easily place a security freeze on their credit files for minimal fees, or even no cost to the consumer. The data from this survey show that the majority of respondents across the states indicate that it is highly important to them that their state work closely with the national credit bureaus to protect consumers from identity theft and other forms of financial fraud.

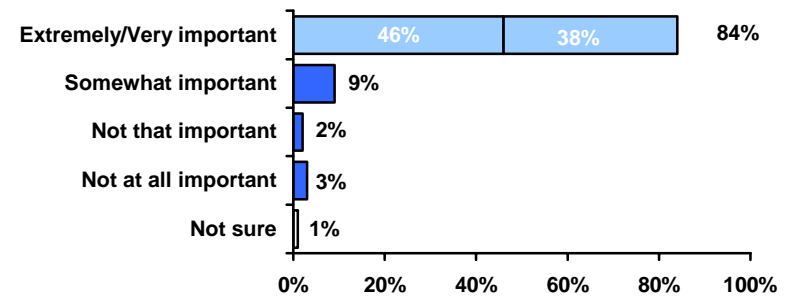
While the big three national credit bureaus have recently made this opportunity available to all consumers (which is of particular importance in the eleven states currently without a state security freeze law and those states with victim only laws) this service they offer has no assurance of being permanent. Moreover, the fees they are charging remain relatively high.

Additionally, in most states, the process for placing a security freeze remains seemingly burdensome and may perhaps be confusing to some consumers – navigating the credit bureau websites, locating appropriate forms, collecting pertinent personal information needed to complete the forms, preparing and sending certified mail, learning the state law or credit bureau requirements, and enduring long periods of time between requests for thaws or removal and the actual thaw or removal. However, some states will soon require a rapid thaw – thawing the security freeze within 15 minutes of the request. Utilizing a toll-free number or a secure internet connection may make a rapid thaw easy to implement.

More research

More research is needed to design and implement a method to track the incidence of security freeze placement nationwide over time and learn how various determinants or barriers such as fees, convenience, or victimization affect a consumer’s decision to place a freeze or not would certainly be warranted. Simultaneously, an evaluation of public outreach messages and education around identity theft and security freeze laws may help determine whether or not consumers are influenced enough by such or which efforts to actually take preventative actions to identity theft such as placing a freeze on their files. Indeed, results from such research is absolutely essential to better design information campaigns to make consumers aware of this tool (and encourage them to use it) and guide policymakers as they consider better ways to protect consumers from identity theft, including by making security freeze laws stronger.

Level of Importance: State Work Closely with National Credit Bureaus and Other Businesses to Protect Consumers From Identity Theft and other Fraud (weighted N=8,412)





ANNOTATED SURVEY

*THE ANNOTATED QUESTIONNAIRE ATTACHED REFLECTS THE TOTALS
FOR ALL STATES SURVEYED*

Total weighted N=8,412; Margin of error= ± 1.07

1. To begin, have you ever contacted a national credit bureau, such as Experian, Equifax, or TransUnion, to request a copy of your credit report?

<u>%</u>	N=8412
40	Yes
59	No
2	NOT SURE [DO NOT READ]
<.5	REFUSED [DO NOT READ]

2. As far as you know, do you have the right to *block* creditors, lenders, or other businesses from reviewing your personal credit report or files in order to establish new credit in your name without your permission?

<u>%</u>	N=8412
38	Yes
42	No
20	NOT SURE [DO NOT READ]
<.5	REFUSED [DO NOT READ]

3. Have you ever heard of or read about the national credit bureaus being required to provide consumers like you the opportunity to block your personal credit report from being used by lenders or creditors to establish new credit in your name without your permission?

<u>%</u>	n=8412
28	Yes
67	No [SKIP TO QUESTION 4a]
4	NOT SURE [DO NOT READ] [SKIP TO QUESTION 16]
<.5	REFUSED [DO NOT READ] [SKIP TO QUESTION 16]

4. Could you tell me what this is called? [DO NOT READ LIST]

<u>%</u>	n=2390
2	Security Freeze [SKIP TO QUESTION 5]
1	Credit Freeze [SKIP TO QUESTION 5]
<.5	Freezing credit [SKIP TO QUESTION 5]
1	Credit report Freeze [SKIP TO QUESTION 5]
0	Credit file Freeze [SKIP TO QUESTION 5]
1	Any Other Word(s) Freeze [SKIP TO QUESTION 5]
2	Fraud Alert [SKIP TO QUESTION 5]
5	Other name or reference NOT using the term 'freeze' [SKIP TO QUESTION 5]
86	Does Not Know Name [DO NOT READ]
2	REFUSED [DO NOT READ]

4a. There are a lot of different services out there to protect consumers. We are interested in whether or not you may have heard the name of this *particular* service. As I read the following, please tell me if you recognize it's name: [RANDOMIZE ITEMS]

% n=7782
4 Credit Report Block [SKIP TO Q 16]
9 Financial Protection Service [SKIP TO Q 16]
18 Fraud Alert [SKIP TO Q 16]
3 Security Freeze
61 NOT SURE [DO NOT READ] [SKIP TO Q 16]
4 REFUSED [DO NOT READ] [SKIP TO Q 16]

5. Where have you heard or read about this – [IF NECESSARY SAY, “Where have you heard or read about the national credit bureaus being required provide consumers the opportunity to freeze their credit files and block creditors from using your credit report information?”] [DO NOT READ]

% n=2523
9 family/friends
9 my bank/credit union
<.5 the senior center
4 got flier in the mail
2 consumer organization/flier or mail
5 consumer org website
1 consumer org representative
2 government/agency website
1 government/agency flier/mail
1 government/agency representative
1 colleague at work
1 Employer
13 Newspaper
9 Financial news/magazine/literature
25 Other
21 Can't remember/NOT SURE [DO NOT READ] [DO NOT READ]
4 REFUSED [DO NOT READ] [DO NOT READ]

IF Q4 OR 4a = FRAUD ALERT, SKIP TO QUESTION 16.

6. Do you currently have a security freeze placed on your credit files that now blocks lenders and creditors from using your personal information to establish new credit in your name without your permission?

% n=1972
28 Yes [**SKIP TO Q6C**]
60 No
11 NOT SURE [**DO NOT READ**] [**DO NOT READ**]
1 REFUSED [**DO NOT READ**] [**DO NOT READ**]

6a. And why not? [**DO NOT READ**]

% n=1415
3 Fees too high/costs too much
7 Never heard of it/Didn't know you could this [**SKIP TO Q 16**]
15 Haven't gotten around to it
4 Doesn't seem like it would work/protect me much
<.5 Other family or friends or people said it doesn't work
1 Want to have access to my credit/this would block *me* from accessing my credit
2 Seems complicated
42 NOT SURE/No reason [**DO NOT READ**]
6 REFUSED [**DO NOT READ**]
21 Other

6b. How likely is it that in the next 6 months you will sign up with a national credit bureau to place a security freeze on your credit files? *Would you be extremely likely, very likely, somewhat likely, not very likely, or not at all likely?*

% n=1321
5 Extremely likely
11 Very likely
24 Somewhat likely
22 Not very likely
33 Not at all likely
5 NOT SURE [**DO NOT READ**]
1 REFUSED [**DO NOT READ**]

[**SKIP TO Q7**]

6c. In general, how easy was it for you have this freeze placed on your credit files? *Would you say it was extremely easy, very easy, somewhat easy, not too easy, or not at all easy for you to have this done?*

% n=556
24 Extremely easy
39 Very easy
25 Somewhat easy [**SKIP TO Q6d**]
5 Not too easy [**SKIP TO Q6d**]
2 Not easy at all [**SKIP TO Q6d**]
5 NOT SURE/REFUSED [**DO NOT READ**]

6cc. Did the credit bureau issue you a pin number to access your account?

% N= 152
55 Yes
29 No
15 NOT SURE [**DO NOT READ**]
1 REFUSED[**DO NOT READ**]

[IF Q6c = ‘EXTREMELY OR VERY EASY OR NOT SURE OR REFUSED, SKIP TO Q7]

(6d). Why do you think that was? [**DO NOT READ**]

% n=182
10 Difficulty with representative
4 Technological problems
2 Didn’t understand the law
<.5 Difficulty getting to post office
5 Couldn’t figure out how it worked/it works
1 PIN or PASSWORD/PASS CODE is too much for me to remember
5 Problems with getting answers to questions
34 Other
38 NOT SURE / CAN’T REMEMBER [**DO NOT READ**]
1 REFUSED [**DO NOT READ**]

RESPONDENT GROUP DEFINITIONS

“AWARE/USER” → (Q3 = YES OR (Q3 = NO AND Q4a = “SECURITY FREEZE”)) AND Q6 = YES “AWARE/NONUSER” → (Q3 = YES OR (Q3 = NO AND Q4a = “SECURITY FREEZE”)) AND Q6 = NO, NOT SURE, OR REFUSED “NOT AWARE” → (Q3 = NOT SURE OR REFUSED) OR (Q3 = NO AND Q4a ≠ “SECURITY FREEZE”))

7. What [IF aware/user INSERT “is” OTHERWISE IF aware/nonuser INSERT “would be”] your MAIN or TOP reason for placing a freeze on your credit files? [DO NOT READ] [ACCEPT ONE RESPONSE/ANSWER]

- % n=1878
- 47 Protect self from identity theft
- 12 Block any businesses or lenders from unnecessarily viewing credit files
- 1 Keep family members from utilizing credit files for personal use
- 1 Other family members/friends/colleagues at work did
- <.5 Friends recommended
- 1 My bank/credit union/financial advisor recommended
- 2 Was a victim of identity theft
- 14 Other
- 3 WOULD NOT BLOCK CREDIT FREEZE [VOLUNTEERED]
- 18 NOT SURE [DO NOT READ]
- 2 REFUSED [DO NOT READ]

8. About how much does a national credit bureau charge residents in [all 7 STATES] to *sign up* to block their credit files or place a freeze on the credit files: [DO NOT READ]

- % n=1878
- 15 Nothing or free [SKIP TO Q. 12]
- <.5 Nothing if you are a victim of ID theft [SKIP TO Q. 12]
- <.5 Less than \$5
- 1 Between \$5 and \$10
- 1 \$10
- 1 More than \$10
- <.5 \$12
- 4 More than \$12
- 76 NOT SURE / CAN'T REMEMBER [DO NOT READ] [SKIP TO Q. 12]
- 1 REFUSED [DO NOT READ] [SKIP TO Q. 12]

9. In your opinion, would you say these fees seem [reasonable, too high, or too low]? [ROTATE RESPONSE ORDER]

- % n=148
- 59 Reasonable
- 39 Too high
- <.5 Too low
- 2 NOT SURE [DO NOT READ]
- REFUSED [DO NOT READ]

[ASK Q10 ONLY IF AWARE/NONUSER AND Q8=\$10, MORE THAN \$10, \$12, OR MORE THAN \$12]

10. Would you be more or less likely to sign up to place a freeze on your credit files if the fee was at least half of the amount the credit bureau currently charges [all 7 STATES]?

% n=54
62 More likely
22 Less likely
9 Current fee does not matter to me
6 NOT SURE [DO NOT READ]
2 REFUSED [DO NOT READ]

[ASK Q11 ONLY IF AWARE/NONUSER AND Q8=\$10, MORE THAN \$10, \$12, OR MORE THAN \$12]

11. Would you be more or less likely to place a freeze on your credit files if doing so was *free* of charge [INSERT STATE]?

% n=54
87 More likely
7 Less likely
1 Current fee does not matter to me
5 NOT SURE [DO NOT READ]
1 REFUSED [DO NOT READ]

12. About how much do the credit bureaus charge residents in your state to lift the block or freeze on their credit files so that a lender or creditor may review for a new loan or purchase? [DO NOT READ]

% n=1878
9 Nothing or free [SKIP TO Q. 22]
<.5 Nothing if victim of identity theft [SKIP TO Q. 22]
<.5 Less than \$5
1 Between \$5 and \$10
1 \$10
1 More than \$10
- \$12
2 More than \$12
85 NOT SURE / CAN'T REMEMBER [DO NOT READ] [SKIP TO Q. 22]
1 REFUSED [DO NOT READ] [SKIP TO Q. 22]

13. In your opinion, would you say these fees seem [reasonable, too high, or too low]? **[ROTATE RESPONSE ITEMS]**

% n=75
65 Reasonable
31 Too high
2 Too low
1 NOT SURE **[DO NOT READ]**
1 REFUSED **[DO NOT READ]**

14. Would you be more or less likely to sign up to place a freeze on your credit files if the fee *for lifting* it was *at least half* of the amount the credit bureau currently charges in [all 7 STATES]?

% n=34
73 More likely
16 Less likely
6 Current fee does not matter to me **[VOLUNTEERED]**
2 NOT SURE **[DO NOT READ]**
4 REFUSED **[DO NOT READ]**

15. Would you be more or less likely to place a freeze on your credit files if the fee for lifting was *free* of charge in [INSERT STATE]?

% n=34
77 More likely
15 Less likely
4 Current fee does not matter to me
4 NOT SURE **[DO NOT READ]**
- REFUSED **[DO NOT READ]**

[SKIP TO Q22]

16. This service is called a security freeze, and in [all 7 STATES] the national credit bureaus are required to provide this protection to you. Basically, a security freeze would block creditors or lenders from using your credit information to establish new credit in your name without your permission. When you want to open a new credit account or get a new loan, you can lift the freeze on your credit file for others to review, either for a period of time or for a specific creditor.

16. (continued) Now knowing this, how likely are you to sign up to place a freeze on your credit files in the next 6 months? *Would you say you are extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*

%	n=6534
7	Extremely likely [SKIP TO Q 17]
10	Very likely [SKIP TO Q17]
24	Somewhat likely
20	Not too likely
33	Not at all likely
5	NOT SURE [DO NOT READ]
<.5	REFUSED [DO NOT READ]

16b. Could you briefly explain why you would not be more likely to sign up to place a freeze on your credit files?

17. To place or activate a freeze on your credit files, you could sign up with one or *each* of the three major credit bureaus. In some states, consumers can sign up to place a freeze with a major credit bureau for a fee of about \$10. For individuals registering with each of the three major credit bureaus this could total \$30.

In your opinion, would you say these fees seem [reasonable, too high, or too low]? [ROTATE RESPONSE ITEMS]

%	N=6534
55	Reasonable
36	Too high
2	Too low
7	NOT SURE [DO NOT READ]
1	REFUSED [DO NOT READ]

18. How likely would you be to sign up to place a freeze on your credit if you had to pay each credit bureau... [RECORD ANSWER FOR EACH OF THE FOLLOWING] [IF RESPONDENT SAYS "EXTREMELY LIKELY", THEN AUTOFILL REMAINING ITEMS IN SERIES AS "EXTREMELY LIKELY" AND SKIP TO Q20]

- \$10? *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*
- What if you had to pay each credit bureau \$7? *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*
- What if you had to pay \$5? [IF NECESSARY: *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*"]
- What if you had to pay any amount from \$1 but less than \$5? [IF NECESSARY: *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*"]

How likely would you be to sign up to place a freeze on your credit if you had to pay each credit bureau...[RECORD ANSWER FOR EACH OF THE FOLLOWING]

\$10	\$7	\$5	\$1 < \$5	
%	%	%	%	n=6534
6	11	20	30	Extremely likely
8	12	17	16	Very likely
26	24	21	19	Somewhat likely
19	15	10	7	Not too likely
38	35	30	26	Not at all likely
2	3	2	2	NOT SURE [DO NOT READ]
1	1	1	<.5	No answer [DO NOT READ]

19. How likely would you be to sign up to place a freeze on your credit files if it were *free* of charge? *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*

<u>%</u>	n=6534
49	Extremely likely
16	Very likely
15	Somewhat likely
5	Not too likely
13	Not at all likely
2	NOT SURE [DO NOT READ]
<.5	No answer [DO NOT READ]

20. Some states allow the credit bureaus to charge consumers a fee, typically less than \$10, *for lifting* their freeze so that a lender or creditor can review their files for a new loan or account.

How likely would you be to sign up to place a freeze on your credit if the fee to lift it was:

- What if you had to pay each credit bureau \$7? *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*
- What if you had to pay \$5? [IF NECESSARY: *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*"]
- What if you had to pay any amount from \$1 but less than \$5? [IF NECESSARY: *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*"]

\$10	\$7	\$5	\$1 < \$5	
%	%	%	%	n=6534
5	8	15	24	Extremely likely
7	8	11	14	Very likely
20	20	21	21	Somewhat likely
20	19	13	9	Not too likely
45	42	38	31	Not at all likely
2	2	2	2	NOT SURE [DO NOT READ]
1	1	1	1	No answer [DO NOT READ]

21. How likely would you be to sign up if lifting the freeze on your credit files were *free* of charge? *Would you be extremely likely, very likely, somewhat likely, not too likely, or not at all likely?*

% n=6534
 44 Extremely likely
 17 Very likely
 17 Somewhat likely
 5 Not too likely
 15 Not at all likely
 2 NOT SURE [DO NOT READ]
 <.5 REFUSED [DO NOT READ]

[THE FOLLOWING QUESTIONS ASKED OF ALL RESPONDENTS]

22. Several states will be requiring credit bureaus to lift a credit freeze within 15 minutes of a consumer’s request. However, in [INSERT STATE], you may have to wait up to 3 days after you notify the credit bureaus to let your information be available to a lender for establishing new credit.

22. (continued) How important is it to you that [INSERT STATE] require the national credit bureaus to lift a consumers' credit freeze within 15 minutes after being notified to do so. *Would you say this is extremely important to you, very important, somewhat important, not that important, or not at all important to you?*

- % n=8412
- 30 Extremely important
- 25 Very important
- 19 Somewhat important
- 10 Not too important
- 14 Not at all important
- 2 NOT SURE **[DO NOT READ]**
- 1 REFUSED **[DO NOT READ]**

23. Currently, to place a freeze on their credit files, you have to get and complete forms providing the credit bureaus with personal financial information and then send the forms in by certified mail. Generally speaking, in thinking about placing a freeze on your credit files, how [easy] would this process be for you?

- % n=8412
- 6 Extremely easy
- 11 Very easy
- 31 Somewhat easy
- 21 Not too easy
- 25 Not at all easy
- 4 NOT SURE **[DO NOT READ]**
- 1 REFUSED **[DO NOT READ]**

24. Again, in thinking about **[IF aware/users** INSERT “managing your credit freeze” OTHERWISE INSERT “signing up to place a freeze on your credit files and managing your freeze”], how **[IF aware/users** INSERT “do you” OTHERWISE INSERT “would you want to”] contact the national credit bureaus? **[IF aware/users** INSERT “Do you” OTHERWISE INSERT “Would you want to”] *contact them.....: [ASK ABOUT AND RECORD ANSWER FOR EACH OF THE FOLLOWING. ASK FIRST THREE IN RANDOM ORDER]*

Yes	No	Not Sure [DO NOT READ]	Refused [DO NOT READ]	
%	%	%	%	n=8412
51	43	5	1	Electronically through the credit bureau's website
44	49	6	1	By calling a credit bureau over the phone and responding to recorded questions
78	18	4	1	By calling a credit bureau over the phone and talking with a representative
30	58	11	1	What other way “do you” / “would you want to” contact the national credit bureaus

25. Besides contacting a national credit bureau, what other places in your community could you turn to for more information about placing a freeze on your credit files? **[DO NOT READ]**

- % n=8412
- 3 The local library
- 2 Police department
- 23 Bank
- 5 Credit union
- <.5 Church
- 3 Financial advisor/broker
- <.5 Senior center
- 1 Federal trade commission
- <.5 Securities commissioner
- 1 Courthouse
- 10 Other
- 57 NOT SURE **[DO NOT READ]**
- 2 REFUSED **[DO NOT READ]**

Identity Theft - ALL

26. During the last five years, has anyone misused your credit card or checking account to make a purchase or get money without your permission?

- % n=8412
- 15 Yes
- 83 No **[SKIP TO Q 29]**
- 1 NOT SURE **[SKIP TO Q 29] [DO NOT READ]**
- 1 REFUSED **[SKIP TO Q 29] [DO NOT READ]**

27. Did you report this experience to anyone?

- % N=1284
- 73 Yes
- 14 No **[SKIP TO Q 29]**
- 13 Bank / Company / Gov't / Other Org Contacted Me **[SKIP TO Q 29] VOLUNTEERED**
- <.5 NOT SURE **[SKIP TO Q 29] [DO NOT READ]**
- 0 REFUSED **[SKIP TO Q 29] [DO NOT READ]**

28. To whom did you report it? **[DO NOT READ]**

- % n=1099
- 3 Family/friends
- 2 Better Business Bureau
- 45 My bank/credit union
- 38 Credit card company
- 1 Loan company/agency
- 1 Consumer protection agency
- 20 Police
- 1 A lawyer
- <.5 FBI
- 1 State Attorney General or State consumer agency/person – Securities Commission
- 1 Federal Trade Commission
- <.5 Utility company – energy/electric/gas; phone
- 8 Other (specify):
- 2 NOT SURE **[DO NOT READ]**
- <.5 REFUSED **[DO NOT READ]**

29. During the last five years, has someone used your personal information like a social security number or account number to obtain new credit cards or loans in your name OR to open other new accounts in your name without your permission?

- % n=8412
- 5 Yes
- 92 No [SKIP TO Q 32]
- 3 NOT SURE **[DO NOT READ]** [SKIP TO Q 32]
- 1 REFUSED **[DO NOT READ]** [SKIP TO Q 32]

30. Did you report this experience to anyone?

- % n=414
- 72 Yes
- 22 No [SKIP TO Q 32]
- 5 Bank / Company / Gov't / Other Org Contacted Me **[VOLUNTEERED]**
- 2 NOT SURE **[DO NOT READ]** [SKIP TO Q 32]
- <.5 REFUSED **[DO NOT READ]** [SKIP TO Q 32]

31. To whom did you report it? **[DO NOT READ]**

- % n=316
- 7 Family/friends
- 4 Better Business Bureau
- 27 My bank/credit union
- 20 Credit card company
- 2 Loan company/agency
- 3 Consumer protection agency
- 37 Police
- 2 A lawyer
- 2 FBI
- 3 State Attorney General or State consumer agency/person – Securities Commission
- 1 Federal Trade Commission
- 4 Utility company – energy/electric/gas; phone;
- 18 Other
- 1 NOT SURE
- 1 REFUSED

32. How concerned are you, personally, about becoming the victim of identity theft – that is the crime where someone steals your social security number or other personal information and uses it to commit fraud – are you *extremely concerned*, *very concerned*, *somewhat concerned*, *not too concerned*, or *not at all concerned*?

- % n=8412
- 29 Extremely concerned
- 26 Very concerned
- 26 Somewhat concerned
- 11 Not too concerned
- 7 Not at all concerned
- <.5 NOT SURE **[DO NOT READ]**
- 1 REFUSED **[DO NOT READ]**

33. In the past 12 months, have you received a letter from your bank, credit union, or other financial institution, or perhaps a retailer or other business alerting you to a breach in security or release of personal or financial information that could negatively affect your finances or credit files?

- % n=8412
- 20 Yes
- 77 No
- 3 NOT SURE**[DO NOT READ]**
- 1 Refused **[DO NOT READ]**

34. How important is it to you that [INSERT STATE] work closely with the national credit bureaus and other businesses and agencies to protect consumers from identity theft and other forms of financial fraud?

% n=8412
46 Extremely important
38 Very important
9 Somewhat important
2 Not that important
3 Not at all important
1 NOT SURE [DO NOT READ]
1 REFUSED [DO NOT READ]

Demographics

% n=8412
48 MALE
52 FEMALE

D1. What is your age as of your last birthday? [RECORD IN YEARS]

% N=8412
29 18-34
28 35-49
22 50-64
16 65+
<.5 Don't Know [DO NOT READ]
5 Refused [DO NOT READ]

D2. What is your marital status? Are you currently.....

% n=8412
51 Married
5 Not married, but living with your partner
2 Separated
10 Divorced
8 Widowed
21 Currently Single and never been married
<.5 DON'T KNOW
3 REFUSED

D3. [IF D2 = 1 ASK: “Are you or your spouse currently a member of A-A-R-P?” IF D2 = 2 ASK: “Are you or your partner currently a member of A-A-R-P?” OTHERWISE ASK: “Are you currently a member of A-A-R-P?”]

% n=8412
23 Yes
73 No
2 DON'T KNOW
2 REFUSED

D4. Thinking about state elections for [all 7 STATES] Governor and Legislators in the last ten years, which of the following best describes your voting behavior? Would you say you vote...

% n=8412
47 Always
21 Most of the time
7 About half the time
6 Seldom
15 Never vote
1 DON'T KNOW
3 REFUSED

D5. Generally speaking, do you consider yourself to be a...

% n=8412
25 Republican
31 Democrat
25 Independent
11 Something else
4 DON'T KNOW
5 REFUSED

D6. In general, how often do you go online to access the Internet or World Wide Web or to send and receive email? Would you say several times a day, about once a day, 3-5 days a week, 1-2 days a week, once every few weeks, less often than every few weeks, or do you never go online to use the Internet or check email?

% n=8412
35 Several Times a Day
16 About Once a Day
8 3-5 Days a Week
7 1-2 Days a Week
3 Once every few weeks
4 Once a Month or Less
24 Never go online
1 DON'T KNOW
3 REFUSED

D7. What is the highest level of education that you completed? (READ)

% n=8412
11 0 to 12th grade, but with no diploma
36 High school graduate or equivalent
11 Post high school education, but with no degree
16 2 year college degree
11 4 year college degree
3 Post-graduate study, but with no degree
8 Graduate or professional degree
<.5 DON'T KNOW
3 REFUSED

D8. Which of the following best describes your current employment status? Are you currently....

% n=8412
8 Self-employed full-time
3 Self-employed part-time
44 Employed full-time
9 Employed part-time
19 Retired and not working at all,
5 Unemployed, but looking for work
9 Not in the labor force for other reasons
<.5 DON'T KNOW
3 REFUSED

D9. Are you of Hispanic, Spanish, or Latino origin or descent?

% N=8412
8 Yes
87 No
<.5 DON'T KNOW
4 REFUSED

D10. And which of the following best describes your race?

% n=8412
74 White/Caucasian
10 Black/African American
1 Asian
2 Native American or Alaskan Native
1 Native Hawaiian or Pacific Islander
6 Some other race?
1 DON'T KNOW
5 REFUSED

D11. We realize income is a private matter and so rather than ask anything specific about your income, I'd like to ask you to please stop me when I get to the category that includes your household's income before taxes in 2006. Was it... [READ]

% n=8412
7 Less than \$10,000
8 \$10,000 but less than \$20,000
13 \$20,000 but less than \$35,000
14 \$35,000 but less than \$50,000
9 \$50,000 but less than \$60,000
7 \$60,000 but less than \$75,000
21 \$75,000 or more
4 DON'T KNOW / NOT SURE
17 REFUSED

D12. What is your 5-digit zip code? _ _ _ _ _

THANKS AND HAVE A GOOD DAY / NIGHT!

AARP is a nonprofit, nonpartisan membership organization that helps people 50+ have independence, choice and control in ways that are beneficial and affordable to them and society as a whole. We produce *AARP The Magazine*, published bimonthly; *AARP Bulletin*, our monthly newspaper; *AARP Segunda Juventud*, our bimonthly magazine in Spanish and English; *NRTA Live & Learn*, our quarterly newsletter for 50+ educators; and our website, www.aarp.org. AARP Foundation is our affiliated charity that provides security, protection, and empowerment to older persons in need with support from thousands of volunteers, donors, and sponsors. We have staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands.



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APPENDIX C



The power to make it better.[®]

Identity Theft Protection: Gauging Support among Adults 18+ in Delaware, Oklahoma, and South Carolina For Security Freeze Legislation

Presented By Jennifer H. Sauer, M.A., AARP

Introduction

With an estimated annual cost of about \$50 billion to businesses and about \$5 billion to individuals, identity theft is becoming one of the fastest growing financial crimes.¹ In their latest report, the Federal Trade Commission estimated that approximately 10 million Americans are victims of this crime each year. While data from the Federal Trade Commission showed that the majority of complaints regarding identity theft were made by people younger than 50 years old, a national survey conducted by AARP found older persons to be disproportionately more vulnerable and susceptible to unfair or deceptive business practices.^{2,3} In fact, adults age 75 and older were twice as vulnerable to identity theft than those ages 65 to 74, and three times more vulnerable to this type of crime than those younger than 65. The AARP survey also found that people aged 50 to 64 were more likely than either those younger or older to feel they have been a fraud victim.

At the time this survey was fielded, some states had implemented, and many more were considering Security Freeze legislation that would enable consumers to freeze or lock their credit files from view by a third party without their consent or authorization. This service would keep identity thieves from opening new credit lines in the name of a potential victim, even if the thief has the victim's full name or Social Security number.

AARP and Information Privacy Policy

AARP supports states strengthening protections against identity theft in areas not clearly preempted by federal law including enabling *all* consumers to place a security freeze on their credit files. While offering a way to help consumers protect their personal financial information from identity thieves, security freeze legislation in the states would allow the three largest credit reporting agencies (CRA) to charge fees to sign up and/or to lift the freeze for credit review and approval for a new loan.

AARP is engaged in advocacy on the state level to require the CRAs to offer consumers a tool that empowers them to protect their most sensitive information from potential identity theft. **AARP believes that current laws do, and proposed security freeze legislation would, allow CRAs to charge fees that are excessive, thereby potentially discouraging consumers from taking personal action to protect themselves from a potential fraud crime.**

¹ Walters, N., *Identity Theft: An Update on the Experience of Older Complaints*. 2004 AARP Public Policy Institute, Data Digest number 12.

² Federal Trade Commission (FTC). *Identity Theft Survey Report* (September 2003). <http://www.ftc.gov/os/2003/09/synovatereport.pdf>

³ AARP, *Consumer Behavior, Experiences and Attitudes: A Comparison by Age Groups*. March 1999.

Survey design and methodology

In March 2006, AARP commissioned Woelfel Research, Inc. to conduct a tri-state survey. The three state-level surveys were conducted between March 17th through March 28th 2006 in Delaware, Oklahoma, and South Carolina where Security Freeze legislation was actively being considered. The total number of completed surveys is 1,203 with 402 completed surveys in Delaware, 400 completed surveys in South Carolina, and 401 completed surveys in Oklahoma. Residents ages 18 and older were surveyed in each state. The maximum statistical error for all 1,203 completed cases is +/-2.8 percent and the overall response rate is 16 percent and the overall cooperation rate is 77 percent. The response rate for this study measured using AAPOR's response rate 3 method.

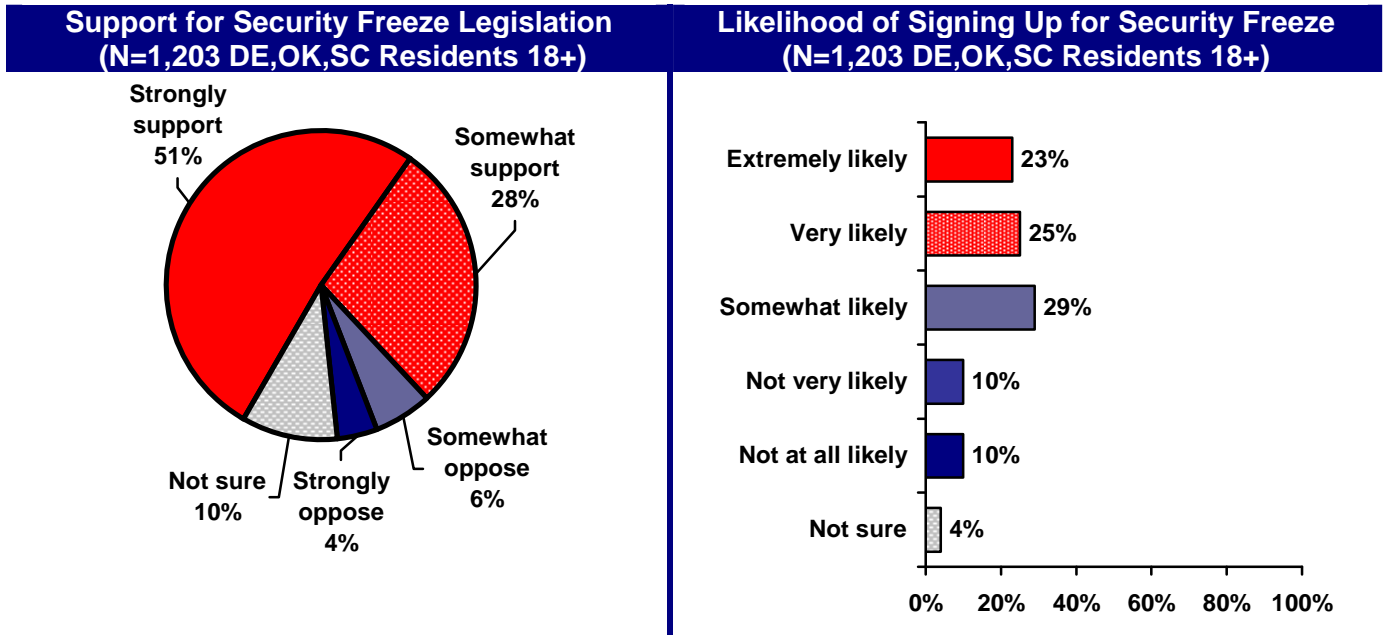
The maximum statistical error for each of the three state surveys is +/- 4.9 percent. The response rate and cooperation rate for each of the three states is as follows:

- Delaware RR3 = 13 percent and COOP3 = 79 percent
- Oklahoma RR3 = 19 percent COOP3 = 76 percent
- South Carolina RR3 = 16 percent COOP3 = 76 percent

Survey responses for each state were weighted to reflect the distribution of age and gender of adults 18 and older in those states. The total sample of 1,203 is also weighted by age and gender based on the three states combined.

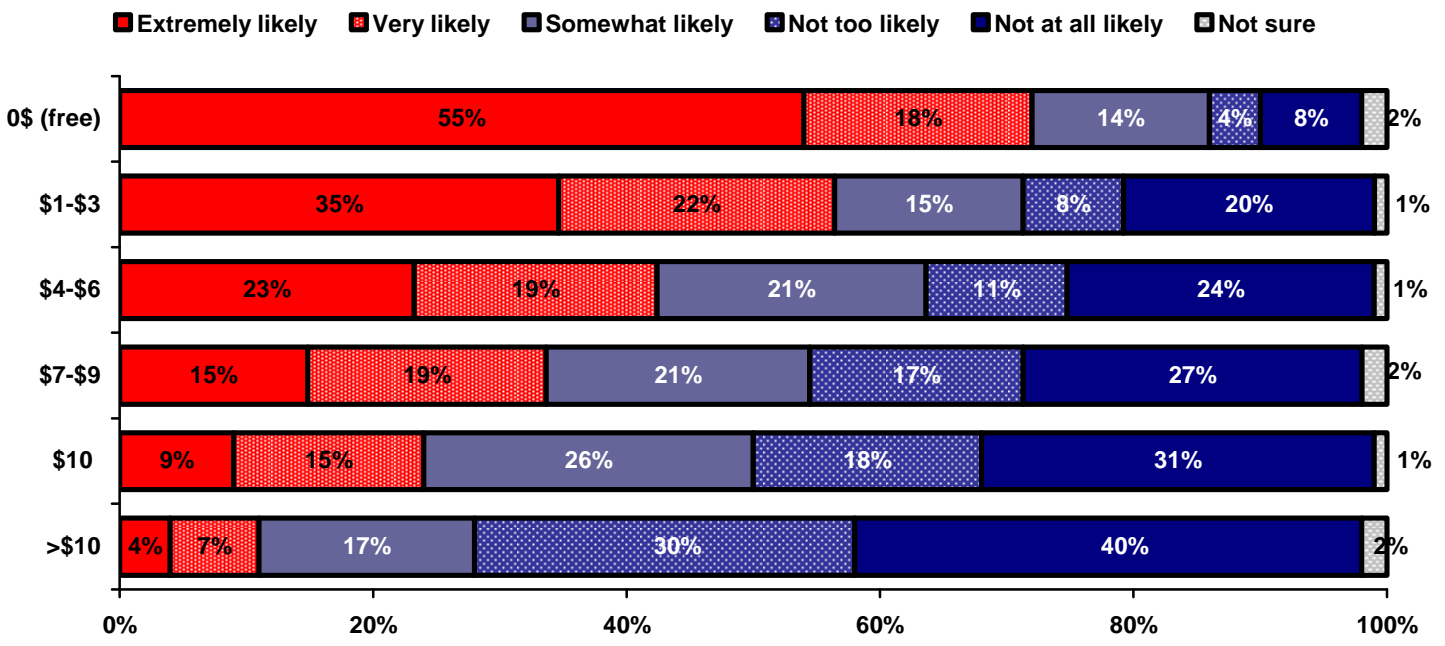
The response rate is Response Rate 3 and the cooperation rate is Cooperation Rate 3 from the following publication: The American Association for Public Opinion Research. 2005. *Standard Definitions: Final Dispositions of Case Codes and Outcome Rates for Surveys*. Ann Arbor, Michigan: AAPOR

Consumers in all three states show high support for Security Freeze legislation in their state, and absent any mention of fees, many would be likely sign up to place a freeze on their credit files if this service were available in their state.

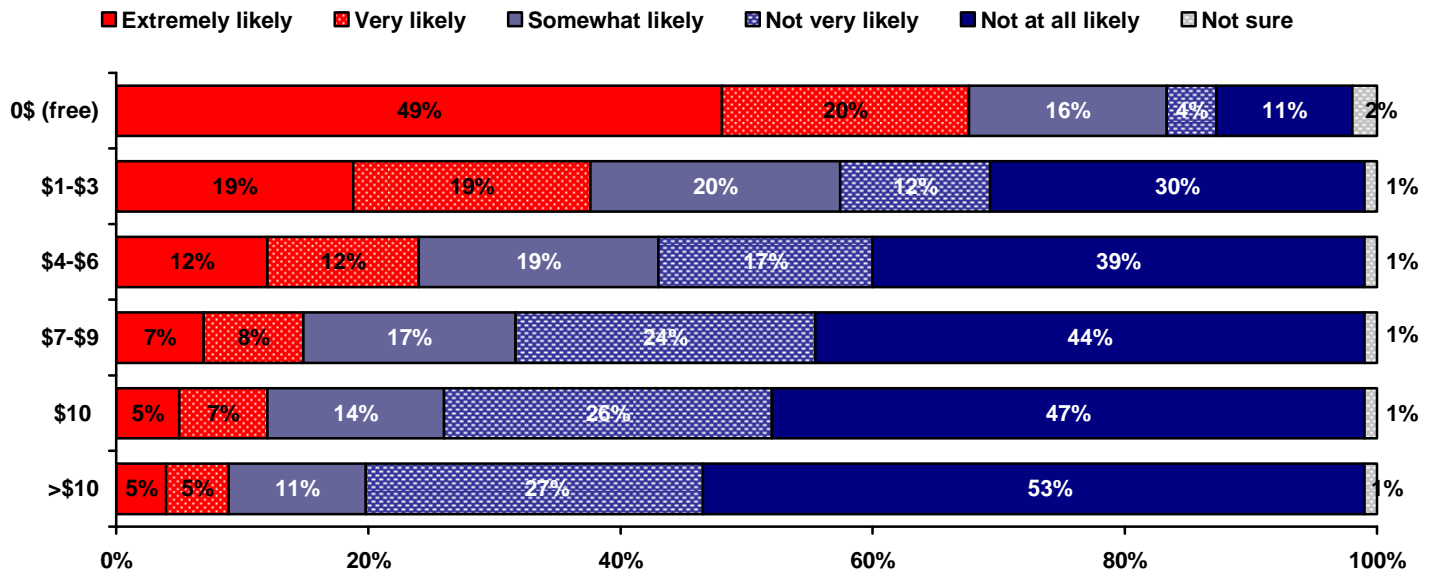


However, after considering the possibility of having to pay the three major credit bureaus a fee to place or lift a credit freeze, likelihood of signing up for the services noticeably decreases as the majority say they are extremely or very likely to participate in this service if they do not have to pay such fees.

Likelihood of Signing up for Credit Freeze Based on Activation Fee Alone (weighted N=1,203 DE, OK, SC Residents 18+)



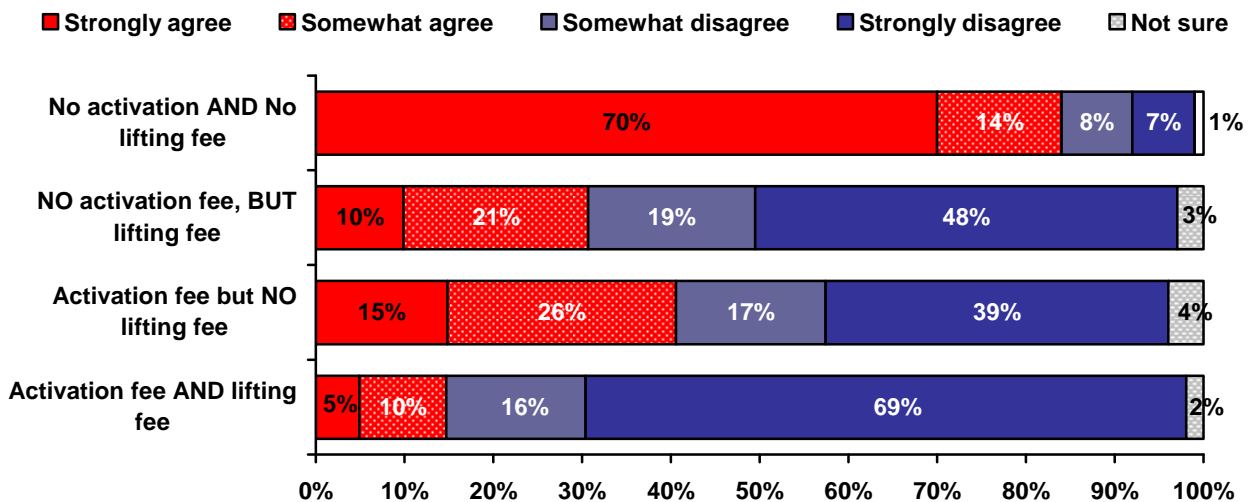
Likelihood of Signing up for Credit Freeze Based on Lifting Fees But NO Activation Fee (weighted N=1,203 DE, OK, SC Residents 18+)



The data indicate that a considerable number of consumers in the state will tolerate minimal fees (such as between \$1 and \$3 and between \$4 and \$6) to place a freeze on their credit files if there is no fee to lift it, but fewer will tolerate being charged similar fee amounts each time they need to lift the freeze regardless of an activation fee. Fewer still are likely sign up for this service if they face being charged a fee to both activate a freeze and to lift it.

The notion of paying fees to place a freeze on their credit files or lift it clearly determines whether consumers will sign up for this service if offered in their state. Moreover, most strongly agree that the state should not allow the credit bureaus to charge either an activation fee or a lifting fee.

Level of Agreement That State Allow Credit Bureaus to Charge Consumers Activation and Lifting Fees (weighted N=1,203 DE, OK, SC Residents 18+)



Recommendations Based on Survey Findings

The data from this survey show that Security Freeze legislation would be well received by consumers and they would be eager to sign up with the major credit bureaus to place a freeze on their credit files to protect them from identity thieves or fraud *if* they do not have to pay a fee to activate the freeze or a fee anytime they want to lift it. If the state determines that credit reporting agencies may charge fees for this service, those agencies may help protect a greater number of consumers in the state if they keep those fees under \$7, but preferably under \$4, as well as consider charging a fee only to activate a freeze rather than to lift it.

Security Freeze Legislation – Then and Now

Since the results of the survey have been released, both Delaware and Oklahoma have passed security freeze laws and they are currently in effect. Security freeze legislation in South Carolina is still pending.

California was the first state to sign Security Freeze legislation into law in 2003. **By the time this report was published in April 2006, 14 states had passed security freeze laws, and only 7 had the law in effect.** The state laws varied as to who could place a freeze (all consumers versus only victims of identity theft), fees for placing, and fees for lifting. Today, 35 states plus the District of Columbia have security freeze laws signed. Most states enacted victim only laws have since either changed their law to allow all consumers the opportunity to place a security freeze or are moving in that direction. Currently only three states remain victim only laws. Several of the most recently passed state laws are requiring lower fees than other states have in the past.

“This survey data helped AARP develop a national strategy for state level identity theft advocacy that included making the price of a security freeze a priority issue. To further our advocacy efforts, we used the data -- and the strength of the consumer attitudes it measured -- to educate both our state level advocates and legislators as they worked on security freeze legislation.” **Adam Goldberg, J.D., Senior Legislative Representative, State & National Initiatives, AARP**

“I cannot remember all of the detail of what I used from the survey, other than the statistic that [the majority] support security freeze legislation in Delaware. I used another survey result in my House Committee testimony, but I cannot remember the specifics. The survey definitely helped us demonstrate support.” **Brian Posey, Associate State Director of Advocacy, AARP Delaware State Office**

Additional Resources and Information:

ConsumersUnion.org, Nonprofit Publisher of Consumer Reports, FinancialPrivacy.org
http://www.consumersunion.org/campaigns/learn_more/003484indiv.html

AARP (2006) Sauer, J. Freeze Legislation: Consumer Attitudes on Paying Activation and Lifting Fees

AARP (2006) Surveys of Age 18+ Residents in Delaware, Oklahoma and South Carolina
http://www.aarp.org/research/frauds-scams/fraud/credit_freeze.html

AARP (2007) Sauer, J. Whose credit is it anyway? A survey of Washington state adults 18+ about security freeze legislation. http://www.aarp.org/research/credit-debt/credit/wa_freeze_2007.html

Eisenstein, E.M. (2006) Marginal Cost to Provide a Security Freeze by a Credit Bureau
Analysis by Dr. Eric M. Eisenstein, Johnson Graduate School of Management, Cornell University

Eisenstein, E.M. (2006) Marginal Cost to Provide Security Thaw by a Credit Bureau
Analysis by Dr. Eric M. Eisenstein, Johnson Graduate School of Management, Cornell University

APPENDIX D

Comparison of State Security Freeze Laws

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Alabama	No Security Freeze Law					
Alaska	No Security Freeze Law					
Arizona	No Security Freeze Law					
Arkansas	ID theft victims	\$10 to place freeze, lift freeze temporarily, or remove freeze altogether	January 1, 2008	Freeze must be requested in writing by certified mail Requestors must also send a valid investigative report, an incident report, or a complaint filed with a law enforcement agency about unlawful use of identifying information by another person	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period credit report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
California	All residents	ID theft victims: None Others: \$10 to place freeze, temporarily lift freeze, or remove freeze altogether; \$12 to lift freeze temporarily for a specific creditor	January 1, 2003	Freeze must be requested in writing by certified mail Victims of identity theft must also include police report of alleged identity theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Unique PIN; • Fee for lifting freeze
Colorado	All residents	No fee for first freeze; \$10 to place a second freeze; \$10 to temporarily lift or remove freeze altogether; \$12 to lift freeze temporarily for a specific creditor	July 1, 2006	Freeze must be requested in writing by certified mail	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Connecticut	All residents	\$10 to place freeze, lift freeze temporarily, or remove freeze altogether; \$12 to lift freeze temporarily for a specific creditor	January 1, 2006	Freeze can be requested in writing by certified mail or other secure method authorized by CRA	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
Delaware	All residents	ID theft victims: None Others: \$20 to place freeze; No fees to lift freeze temporarily or for specific creditor nor to remove freeze	October 9, 2006	Freeze can be requested by mail, telephone or electronic mail when such method is available (electronic method must be available by January 31, 2009)	Maximum of 3 business days By January 31, 2009, the time to lift a freeze will be 15 minutes	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
District of Columbia	All residents	ID theft victims: None Others: \$10 to place freeze; No fee to lift freeze temporarily or to remove freeze altogether	July 1, 2007	Freeze must be requested in writing by certified mail (electronic method must be available by September 1, 2008)	Maximum of 3 business days By September 1, 2008, the time to lift a freeze will be 15 minutes if request is placed via phone or secure electronic connection	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
Florida	All residents	ID theft victims and residents ages 65 years and older: None Others: \$10 to place freeze, lift freeze temporarily, remove freeze, and replace PIN	July 1, 2006	Freeze must be requested in writing by certified mail Victims of identity theft must send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
Georgia	No Security Freeze Law					

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Hawaii	All residents	ID theft victims: None Others: \$5 to place freeze, temporarily lift freeze, or remove freeze altogether	Original law (ID theft victims only) – January 1, 2007 Amended law (all residents) – June 15, 2007	Freeze must be requested in writing by certified mail	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
Idaho	No Security Freeze Law					

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Illinois	All residents	ID theft victims and residents ages 65 years and older: None Others: \$10 to place freeze, lift freeze temporarily, or remove freeze altogether	Original law (ID theft victims only) – January 1, 2006 Amended law (all residents) – January 1, 2007	Freeze must be requested in writing by certified mail Victims of identity theft must provide valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
Indiana	All residents	No fee to place freeze, lift freeze temporarily, or remove freeze altogether; No fee for PIN reissue	September 1, 2007	Freeze must be requested in writing by certified mail (electronic method must be available by January 1, 2009)	Maximum of 3 business days By January 1, 2009, the time to lift a freeze will be 15 minutes	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Iowa	No Security Freeze Law					
Kansas	Victims of ID theft only	None	January 1, 2007	Freeze must be requested in writing by certified mail Requestors must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
Kentucky	All residents Security freeze automatically expires after 7 years from date of placement	ID theft victims: None Others: \$10 to place freeze, lift freeze temporarily, remove freeze altogether, or replace PIN	July 11, 2006	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Louisiana	All residents	ID theft victims and residents ages 62 years or older: None Others: \$10 to place freeze; \$8 to lift freeze; No fee to remove freeze altogether	July 1, 2005	Freeze must be requested in writing by certified mail	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
Maine	All residents	ID theft victims: None Others: up to \$10 to place freeze, temporarily lift freeze, remove freeze, and have PIN reissued; \$12 for temporary freeze lift for a specific creditor	February 1, 2006	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Maryland	All residents	ID theft victims: None Others: \$5 to place freeze, temporarily lift freeze, or remove freeze altogether	January 1, 2008	Freeze must be requested in writing by certified mail (electronic and phone methods must be available by January 1, 2010) Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days By January 31, 2009, the time to lift a freeze will be 15 minutes	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Massachusetts	All residents	ID theft victims and Spouses: None Others: \$5 to place freeze, temporarily lift freeze, or remove freeze altogether	February 3, 2008	Freeze must be requested in writing by certified mail (electronic and phone methods must be available by January 1, 2010) Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
Michigan	No Security Freeze Law					

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Minnesota	All residents	ID theft victims: None Others: \$5 to place freeze, temporarily lift freeze, remove freeze altogether, and have PIN reissued	August 1, 2006	Freeze can be requested in writing by certified mail, by telephone, or by secure electronic mail connection with CRA Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	CRAs may develop procedures involving use of telephone, fax, or internet in order to lift a freeze, with a goal of processing a request within 15 minutes, but no later than three (3) business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
Mississippi	ID theft victims only	\$10 to place freeze No additional fees to lift freeze temporarily or remove freeze altogether	July 1, 2007	Freeze must be requested in writing by certified mail Requestors must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Missouri	No Security Freeze Law					
Montana	All residents	<p>ID theft victims: None</p> <p>Others: \$3 to place freeze, temporarily lift freeze; Fee of up to \$5 to have PIN reissued; No fee to have freeze removed altogether</p>	July 1, 2007	<p>Freeze must be requested in writing by certified mail (electronic and telephone methods must be available by January 31, 2009)</p> <p>Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft</p>	<p>Maximum of 3 business days</p> <p>By January 31, 2009, the time to lift a freeze will be 15 minutes</p>	<p>Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following:</p> <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
<p>Nebraska</p>	<p>All residents</p> <p>Security freeze automatically expires after 7 years from date of placement</p>	<p>ID theft victims and Minors: None</p> <p>Others: One time fee of \$15 to place freeze (no additional fees to temporarily lift freeze or remove freeze altogether)</p>	<p>September 1, 2007</p>	<p>Freeze must be requested in writing by certified mail</p> <p>Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft</p>	<p>Maximum of 3 business days</p> <p>Effective January 1, 2009, CRAs must lift a freeze no later than 15 minutes after receiving request by secure electronic method. The request must be received between 6:00 am and 9:30 pm, seven days per week, in the applicable time zone</p>	<p>Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following:</p> <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Nevada	All residents	ID theft victims and consumers ages 65 years and older: None Others: up to \$10 to place freeze, lift freeze temporarily, or remove freeze altogether; \$20 for lift of freeze for a specific creditor	Original law (ID theft victims only) – October 1, 2005 Amended law (all residents) – October 1, 2007	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
New Hampshire	All residents	ID theft victims: None Others: \$10 to place freeze, temporarily lift freeze, or remove freeze altogether	January 1, 2007	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
New Jersey	All residents	None for initial freeze; Fee of up to \$5 to temporarily lift freeze, remove freeze altogether, or have PIN reissued	January 1, 2006	Freeze can be requested in writing by certified or overnight mail, or by secure electronic mail connection with CRA	Maximum of 3 business days CRAs shall develop procedures to process lift requests in an expedited manner	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
New Mexico	All residents	<p>ID theft victims and residents over 65 years of age: None</p> <p>Others: \$10 to place a freeze; \$5 to lift or remove freeze altogether</p>	July 1, 2007	<p>Freeze must be requested in writing by certified mail (freeze may also be requested via telephone or secure electronic method if such means are provided by CRA)</p> <p>Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft</p>	<p>Maximum of 3 business days</p> <p>By September 1, 2008, the maximum time to lift a freeze will be 15 minutes</p>	<p>Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following:</p> <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
New York	All residents	ID theft victims: None Others: Free to place initial freeze; \$5 to lift freeze temporarily or remove freeze altogether; After initial freeze, there is a \$5 fee to re-start freeze after it has been removed	November 1, 2006	Freeze must be requested in writing by certified mail	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
North Carolina	All residents	ID theft victims: None Others: up to \$10 to place freeze, lift freeze temporarily, or remove freeze altogether	December 1, 2005	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Ohio	No Security Freeze Law					
Oklahoma	All residents	<p>ID theft victims and consumers ages 65 years and older: None</p> <p>Others: \$10 to place freeze, lift freeze temporarily, or remove freeze altogether</p>	January 1, 2007	<p>Freeze must be requested in writing by certified mail</p> <p>Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft</p>	Maximum of 3 business days	<p>Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following:</p> <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Oregon	All residents	ID theft victims: None Others: \$10 to place freeze, lift freeze temporarily, or remove freeze altogether	October 1, 2007	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Pennsylvania	All residents Security freeze automatically expires after 7 years from date of placement	ID theft victims and consumers ages 65 years and older: None Others: up to \$10 to place freeze, lift freeze temporarily, or remove freeze altogether	January 1, 2007	Freeze can be requested in writing by certified or overnight mail, or by secure electronic mail connection with CRA (if available) Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
Puerto Rico	No Security Freeze Law					

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Rhode Island	All residents	ID theft victims and consumers ages 65 years and older: None Others: \$10 to place freeze, lift freeze temporarily, or remove freeze altogether	September 28, 2006	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft.	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
South Carolina	No Security Freeze Law					

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
South Dakota	Victims of ID theft only Security freeze automatically expires after 7 years from date of placement	None	July 1, 2006	Freeze must be requested in writing by certified mail Requestors must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
Tennessee	All residents	ID theft victims: None Others: \$7.50 to place freeze; No fee to lift freeze temporarily; \$5 to remove freeze altogether	January 1, 2008	Freeze must be requested in writing by certified mail (electronic method must be made available by January 31, 2009)	CRAs must lift a freeze no later than 15 minutes after receiving request by secure electronic method if request is received between 6:00 am and 9:30 pm, seven days per week, in the applicable time zone	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Texas	All residents	ID theft victims: None Others: \$10 to place freeze, lift freeze temporarily, or remove freeze altogether; \$12 to lift freeze for a specific creditor	Original law (ID theft victims only) – September 1, 2003 Amended law (all residents) – September 1, 2007	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible
Utah	All residents	ID theft victims: None Others: Utah’s law allows CRAs to charge “reasonable fees” without specifying the amount that can be charged	September 1, 2008	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days from receiving request by mail, or no more than 15 minutes after receiving request electronically	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Vermont	All residents	ID theft victims and consumers ages 65 years and older: None Others: \$10 to place freeze; \$5 to lift freeze temporarily or remove freeze altogether	Original law (ID theft victims only)- July 1, 2005 Amended law (all residents)- July 1, 2006	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Entity receiving credit information
Virgin Islands	No Security Freeze Law					
Virginia	No Security Freeze Law					

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Washington	Victims of ID theft or those notified of a security breach of their computerized personal information Beginning September 1, 2008, all residents will be eligible for a freeze	ID theft victims or those notified of a breach: None Beginning September 1, 2008, there will be a \$10 fee to place a freeze, lift freeze temporarily, or remove freeze altogether; No fee for persons ages 65 years and older	Original Law (ID theft victims only)- July 24, 2005 Amended Law (all residents)- September 1, 2008	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days By September 1, 2008, the maximum time to lift a freeze will be 15 minutes	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
West Virginia	All residents	ID theft victims: None Others: \$5 to place freeze, lift freeze temporarily, or remove freeze altogether	July 2, 2007	Freeze must be requested in writing by certified or overnight mail (electronic method must be made available by January 31, 2009) Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days By September 1, 2008, the maximum time to lift a freeze will be 15 minutes	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible

State	Who Can Place Security Freeze	Fees	Effective Date	How to Request Security Freeze	Amount of Time Taken to Lift Freeze	Methods to Lift Freeze
Wisconsin	All residents	ID theft victims: None Others: \$10 to place freeze, lift freeze temporarily, or remove freeze altogether	January 1, 2007	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible
Wyoming	All residents	ID theft victims: None Others: \$10 to place freeze, lift freeze temporarily, or remove freeze altogether	July 1, 2007	Freeze must be requested in writing by certified mail Victims of ID theft must also send a valid copy of a police report, investigative report, or a complaint to a law enforcement agency about alleged ID theft	Maximum of 3 business days By September 1, 2008, the maximum time to lift a freeze will be 15 minutes	Requestors must use preferred contact method of each CRA (telephone, fax or e-mail), and submit the following: <ul style="list-style-type: none"> • Proper ID; • Unique PIN or password; • Time period that report will be accessible