



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

WASHINGTON, D.C. 20580

Office of the Secretary

August 17, 2011

Jeffrey Harris
State of New York

Re: In the Matter of SettlementOne Credit Corporation, File No. 082 3209
In the Matter of ACRAnet, Inc., File No. 092 3088
In the Matter of Statewide Credit Services, File No. 092 3089

Dear Mr. Harris:

Thank you for your comment on the Federal Trade Commission's proposed consent agreements in the above-referenced proceedings. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

Your comment expresses a concern that these consent agreements will not effectively deter the respondents, or any other resellers, from failing to implement reasonable steps to secure and protect sensitive consumer report information. You also ask that they be rejected and that the Commission take steps to "shut down" these companies.

The Commission believes that these consent agreements contain strong injunctive relief which will ensure that the respondents adequately safeguard sensitive consumer information. Among other things, the agreements require that these companies retain third-party experts to perform comprehensive data security assessments biennially for twenty years. The Commission also believes that these cases serve as notice to other consumer reporting agencies that reasonable security must take into consideration and ameliorate risks to consumer report information posed by end users. Further, we believe that these cases demonstrate that the Commission takes its enforcement responsibilities seriously, and remains deeply committed to protecting consumers.

The Commission has determined that the public interest would best be served by issuing the Decisions and Orders in final form without modification. The final Decisions and Orders and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and we thank you again for your letter.

By direction of the Commission.

Donald S. Clark
Secretary