

Richard J. Dougherty  
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Dec. 18, 2004

Federal Trade Commission  
Office of the Secretary Room H-159 (Annex O)  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

re: FACTA Credit Score Fee, Project No. R411004

Dear Mr. Secretary:

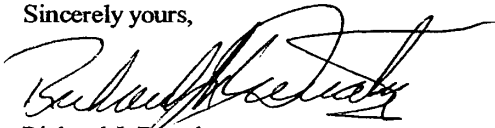
Credit scores are entirely "DERIVED" statistical calculations, and can only be as accurate as the original data from which they are derived. Since the running record of the CRA's, mainly the three big ones, Trans Union, Equifax, and Experian is dismal in percentage of inaccuracies on EACH person and on all persons files that they keep, there is NO WAY that credit scores may be considered accurate AT ALL.

But Congress has rolled over to permit them to use credit scores, bending and tilting in the wind to the graft money paid by the CRA's to gain their favor (they should have entirely outlawed the use of credit scores or any such similar devices based on CRA records)•

Now you are seeking input as to what is a "fair fee" for the CRA's to charge in order for individuals to obtain a copy of their credit scores. My answer is ZERO dollars and cents. The only sense that can be made of credit scores is NONSENSE. They are NOT fairer, they are grotesquely UNFAIR. Credit Bureaus should in no way be encouraged or even able to reimburse their costs for providing INCOMPETENT data.

I vote \$ 0.00 as a fair fee.

Sincerely yours,

  
Richard J. Dougherty