



**Report to Congress  
Under Section 319 of the  
Fair and Accurate Credit  
Transactions Act of 2003**

**December 2012**

**Federal Trade Commission**

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## Executive Summary

Pursuant to Section 319 of the Fair and Accurate Credit Transactions Act (“FACT Act”), the Federal Trade Commission (“FTC”) submits its fifth interim report on a national study of credit report accuracy.

Section 319 of the FACT Act requires the FTC to conduct a study of the accuracy and completeness of consumer credit reports. The FTC contracted a research team to conduct two pilot studies and collect the data for the main study described in this report. The research team included members from the University of Missouri, St. Louis (UMSL), the University of Arizona, and the Fair Isaac Corporation. The contractor produced statistical tabulations of errors at the case (consumer) level, individual credit report level, and credit report item level. At the conclusion of the study, the contractor provided data in a de-identified format as well as an in-depth report summarizing the findings; the contractor’s report is included as Appendix D. Economists in the Bureau of Economics at the FTC independently analyzed the data and drafted this report.

This study of credit report accuracy was the first national study designed to engage all the primary groups that participate in the credit reporting and scoring process: consumers, lenders/data furnishers, the Fair Isaac Corporation (“FICO”), and the national credit reporting agencies (“CRAs”). In brief, the study design called for consumers to be randomly selected from the population of interest (consumers with credit histories at the three national CRAs). Ultimately, 1,001 study participants reviewed 2,968 credit reports (roughly three per participant) with a study associate who helped them identify potential errors. Study participants were encouraged to use the Fair Credit Reporting Act (“FCRA”) dispute process to challenge potential errors that might have a material effect on the participant’s credit standing (i.e., potentially change the credit score associated with that credit report). When a consumer identified and disputed an error on a credit report, the study associate informed FICO of the disputed items, and FICO generated a provisional FICO score for the report under the assumption that all consumer allegations were correct. After the completion of the FCRA dispute process, study participants were provided with new credit reports and credit scores. Using the provisional FICO score, the new credit reports and credit scores, and the original credit reports and credit scores, we are able to determine the impact on the consumer’s credit score from both potential and confirmed material errors.

Overall, we find that 26% of the 1,001 participants in the study identified at least one potentially material error on at least one of their three credit reports. Although 206 consumers (21% of the participants) had a modification to a least one of their credit reports after the dispute process, only 129 consumers (13% of participants) experienced a change in their credit score as a result of these modifications. Each affected participant may have as many as three score changes. Of the 129 consumers with any score change, the maximum changes in score for over half of the consumers were less than 20 points. For 5.2% of the consumers, the resulting increase in score was such that their credit risk tier decreased and thus the consumer may be more likely to be offered a lower auto loan interest rate.

Consumers were recruited to participate through a mailed invitation and an online registration process. The response rate was low (3.9%) relative to standard surveys, possibly due to the private and personal nature of the information analyzed (credit reports). However, the response rate is consistent with the FTC pilot studies and other studies of this issue (e.g., the PERC study discussed below).

The solicitation process was designed to recruit a participant sample that is representative of the credit scores of the population of interest. Because consumers voluntarily participated in a study that required a moderate time commitment and reviewed personal data, there is the chance that the participant sample is not entirely representative of consumers with credit reports. Various credit and non-credit data on non-respondents were collected to evaluate this issue. Upon comparing participants and non-participants on multiple dimensions, we found participants to be similar to non-participants in the majority of factors that might impact credit scores. To the extent that significant differences arise, we expect the potential biases to be modest.

For the purposes of this study, we define a ‘*potential error*’ as an alleged inaccuracy identified by the participants with the help of the study associate. Credit reports contain a great deal of information, including identifying personal information, credit account information, public records, collections accounts, and inquiries. Lenders often use the credit score associated with a credit report to assess the credit risk of a particular consumer. Therefore, we define a ‘*potentially material error*’ as an alleged inaccuracy in information that is commonly used to generate credit scores. Information used to generate credit scores include the number of collections accounts, the number of inquiries (hard pulls on a credit file), the number of negative items such as late or missed payments, and other factors. An alleged error is considered potentially material prior to the dispute process simply by its nature as an item used to generate credit scores.

Through the dispute process and FICO rescoring analysis, we determine the extent to which consumer credit reports contained confirmed material errors. We define a ‘*confirmed material error*’ in several ways, though all rely on a confirmed error being determined as a result of the FCRA dispute process. After the disputes were filed and completed, the study associate drew new credit reports for the consumer and analyzed whether there were changes to the report in response to the dispute. If there were no changes to the report, the original FICO score is relevant for our calculations and if all the alleged inaccurate items were modified by the CRA, the provisional FICO rescore is the relevant credit score. If only some of the disputed items were changed, the modified report was sent to a FICO analyst for a second rescoring to assess the impact of the modifications. The relevant FICO score at the conclusion of the dispute and rescoring process is then compared to the original FICO score to determine how the credit report inaccuracies affected the consumer credit score.

The most conservative definition of a confirmed error is the situation where the consumer disputes an item on a credit report, instructs the CRA on how to modify the report, and the CRA agrees with every element of the consumer dispute and follows all of the consumer’s instructions. There are a number of reasons, however, why a CRA may make changes to a credit report that differ from the consumer’s instructions. For example, a consumer may dispute an account balance and instruct the CRA to change the balance to a specific amount (i.e., the consumer alleges what is incorrect and what action by the CRA would set it right). If the CRA

cannot confirm the existence of the account with the data furnisher, the account is removed from the consumer's credit report; in this case the outcome is not what the consumer requested. In addition, a consumer may dispute multiple items on a credit report as inaccurate and the CRA may only modify a subset of the disputed items, thus suggesting that the consumer was correct regarding some of the inaccuracies on the report but not all.

The nature of the types of errors and the possible actions by CRAs makes strictly defining a 'confirmed error' somewhat complicated. Thus, a more expansive definition of a consumer with a confirmed error is one where a consumer disputes at least one item with a CRA and the CRA makes at least one modification to that credit report in response to the dispute. Note that this expansive definition would include consumers who are not entirely satisfied with the outcome of the dispute because some of their requested changes were not made by the CRA(s).

In addition, there are some consumers who file disputes and yet the CRA makes no modification to their report. For the purpose of the analysis within this report, these consumers are not defined as having a confirmed material error. It is important to note that these consumers with alleged potentially material errors that are not confirmed through the FCRA dispute process may still have inaccurate items on their credit reports; however, we are unable to verify the inaccuracy within the design of this study. In a separate section, we report the hypothetical impact on credit score if every alleged inaccuracy disputed by consumers was modified by the relevant CRA (i.e., assuming every alleged potentially material error that the consumer disputed was in fact a 'confirmed error.')

There is no established rule or threshold for classifying the significance of a credit score change as minor or major because the impact of a change in score is dependent on the current score. That is, a 25 point change in FICO score that keeps the consumer in a particular credit risk category may not have a large impact on the person's likelihood of receiving credit. On the other hand, a one-point change in credit score that moves a consumer from one risk tier to the next may have a large impact on the consumer's access to credit or the products and rates the consumer is able to secure. Below we report the frequency of reports and consumers that have any change in score, changes in score more than 10 points, more than 25 points, and changes in score that move a consumer from one credit risk tier to another.

There are a number of advantages to the methodology of this study relative to previous work on the issue of accuracy. One important feature is our ability to assess accuracy at both the credit report level and the consumer level, because each consumer reviews all available credit reports. Because the *consumer* is the primary unit of analysis, we are able to provide reliable estimates of the proportion of American consumers who would encounter material errors across their three credit reports. Considering that lenders often use a composite of the consumer's three reports and scores in making a credit decision, the impact of material errors on consumers is a focal point of the study.

We cannot provide information on the extent to which there may be errors on consumer credit reports that positively impact a consumer's credit score. The methodology of the study primarily identifies material errors that have a negative impact on the consumer. Through the study design, consumers become well-educated about their personal credit reports and the negative items that

appear on their reports. Study associates informed consumers that all disputes may have a positive or negative impact on the consumer's credit score because credit scores are determined by the entirety of a credit report. In general, consumers tended to dispute allegedly inaccurate information that was negative.

It is also important to note the slight distinction between a consumer report and a credit report. A consumer report may include information that relates to a person's character, reputation, or personal characteristics and tends to be used for employment and housing. The focus of this report is on credit reports provided by the national CRAs, which are a collection of data that summarize a consumer's credit history and are used to evaluate the potential risk of lending to a particular consumer.

In sum, 1,001 consumers reviewed 2,968 credit reports. The main findings from this study are:

- The proportion of consumers who encounter one or more potential material errors over their three credit reports is well within the wide range reported by previous accuracy studies performed by consumer advocacy groups, credit reporting industry specialists, and other government agencies.
  - There were 262 individuals out of 1,001 participants (26%) who filed a dispute with at least one CRA.
  - Consumers alleged inaccuracies and filed disputes for 19% of the credit reports examined with the study associate (572 of the 2,968 credit reports).
  
- Confirmed error rates at the consumer level range from 10% to 21%, depending on the definition of confirmed error.
  - *The most conservative definition:* Defining a consumer with a “confirmed material error” as someone who alleges a potentially material error and the CRA modifies every disputed item, we find that 97 consumers (9.7% of the sample) encounter one or more confirmed material errors across their credit reports.
  - *A less conservative definition:* Defining a consumer with a “confirmed material error” as someone who identifies, disputes, and has any modification made to a report, we find that 206 consumers (21% of the sample) encounter a confirmed material error on one or more of their credit reports.
  
- The estimated proportion of reports and consumers who experience a credit score change resulting from modification of a credit report is higher than previous estimates from the credit reporting industry.
  - Of the 572 credit reports that are disputed, 399 reports had a modification made by a CRA and 211 reports had a score change (the latter comprising 7.1% of reports examined).
  - A total of 6.6% of reports examined (195 out of 2,968) had an increase in score due to modifications following the dispute process and a third of these score increases (66 reports) were increases of less than 10 points.
  - Of the 262 consumers who identified alleged inaccuracies and filed disputes, 206



consumers had a modification made by a CRA to their credit report in response to the dispute. Of these, 129 consumers experienced a change in credit score following the dispute process (comprising 12.9% of the sample).

- The main types of disputed and confirmed material errors (defined as a disputed error that is modified by the CRA) are errors in the tradeline (consumer accounts) or collections information.
  - The most common alleged inaccuracies occur in the data on tradelines (708 alleged errors on 409 reports, comprising 13.8% of the sample) or collections accounts (502 alleged errors on 223 reports, comprising 7.5% of the sample).
  - The most commonly modified errors are tradeline information errors (395 modifications) and collections information errors (267 modifications).
  
- Errors in header information (current/previous address, age, or employment) are not considered in determining a FICO credit score and thus are not defined as material in the context of this study. However, header information is used in generating consumer profiles and thus it is worthwhile to assess the rate of header information error. In cases where a participant identified *only* an error in header information, the participant was instructed to dispute the error directly with FICO and the participant's credit report was not redrawn. For the individuals with material errors *and* header information errors, the outcome for the header information disputes is known.
  - The third most common alleged inaccuracies occur in the data on header information (154 alleged errors on 127 reports, comprising 4.3% of the sample). Note this represents a lower bound of the frequency of header information errors, as reports with errors only in header information are not included.
  - The modification rate for header information is higher than that of other alleged material error types (99 modifications, comprising 64.3% of the disputed header information items).
  
- Note that 211 reports and 129 consumers experienced modifications that resulted in a score change. The magnitudes of score changes due to modifications from the dispute process are as follows:
  - Of the 211 reports with a score change, 62 reports (29% of reports with a score change) had a score increase of more than 25 points.
  - Of the 211 reports with a score change, 129 reports (61% of reports with a score change) had a score increase of more than 10 points.
  - Of the 211 reports with a score change, 65 reports (31% of reports with a score change) had an increased score such that the participant moved to a lower risk classification for auto loans, implying a lower interest rate (risk classification tiers provided by FICO).
  - Of the 1,001 participants, 52 (5.2%) experienced a change in score such that their credit risk tier decreased and therefore may be more likely to be offered a lower auto loan interest rate.

- The estimated proportion of consumers with score changes and the distribution of score changes are different when we do not restrict a confirmed error to be determined by the FCRA resolution process. If every consumer allegation of a potentially material error is taken to be true, then there are 262 consumers with material errors and 572 reports with inaccuracies. We use the provisional FICO score to determine the potential score change on the disputed credit reports. Note these are hypothetical score changes if every disputed item was modified.
  - Of the 572 disputed reports, 363 reports (63%) would experience a change in score.
  - Of the 363 reports with a potential score change, 150 reports (41%) would experience an increase of more than 25 points.
  - Of the 363 reports with a potential score change, 251 reports (69%) would experience an increase of more than 10 points.
  
- Of the 262 study disputants who filed disputes regarding potentially material errors under the FCRA dispute process, 206 experienced a modification by a CRA. Over half of the 206 consumers with modifications continued to have information appear on a credit report that the consumer alleged was inaccurate.
  - 97 consumers (37% of disputants) had modifications that addressed all of their disputes in some manner so that there was no longer conflict between the credit report and consumer allegations.
  - 109 consumers (42% of disputants) had modifications to their reports but also had some disputed items remain as originally stated on their credit report.
  - 56 consumers (21% of disputants) disputed information but had no changes made to their report; i.e., the allegedly incorrect information was maintained by the data furnisher as being correct.

# 1 Introduction

The Federal Trade Commission (“FTC” or “the Commission”) submits this report pursuant to Section 319 of the Fair and Accurate Credit Transactions Act of 2003 (“the FACT Act”). The FACT Act amends the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”) and contains a number of provisions designed to enhance the accuracy and completeness of credit reports. Section 319 of the FACT Act requires the Commission to conduct:

“an ongoing study of the accuracy and completeness of information contained in consumer reports prepared or maintained by consumer reporting agencies and methods for improving the accuracy and completeness of such information.”<sup>2</sup>

Congress instructed the FTC to complete this study by December 2014, when a final report is due. Further, starting with the interim 2004 report, a total of five interim reports are required over respective two year intervals. This report is the fifth such interim report.

Prior studies of credit report accuracy and completeness essentially fall into three categories: consumer surveys, studies based on dispute data statistics, and studies based on anonymous data provided by the credit reporting agencies (“CRAs”) about a large number of individual consumers. The FTC’s review of prior studies determined that, although each approach provides some useful information about credit report accuracy and completeness, none provides a comprehensive view.<sup>3</sup> Indeed, with the exception of one recent study produced by a consulting firm for the credit reporting industry (see below), none of the existing studies relied on the participation of all three of the key stakeholders in the credit reporting process: consumers, data furnishers, and the CRAs. Questions have also been raised about the reliability and representativeness of the samples used in the prior studies.

The objective of the FTC 319 Accuracy Study is to produce a statistically reliable evaluation of credit report accuracy. This study was designed to be the first to engage all the primary groups that participate in the credit reporting and scoring process: consumers, lenders/data furnishers, the Fair Isaac Corporation, and the CRAs. The following sections provide an overview of the credit reporting industry, the dispute process, the need for an accuracy study, and the previous studies on the topic of accuracy in credit reporting.

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<sup>2</sup> “Completeness” as used in Section 319 of the FACT Act (and in this report) refers to the quantity of information in a consumer’s file that would be increased by the addition of more transactions, such as those referred to in FACT Act Section 318(a)(2)(D) and (E) to the consumer reporting system. For example, a file would be more “complete” if it included information about the consumer’s rental payments.

<sup>3</sup> *Report to Congress under Sections 318 and 319 of the Fair and Accurate Credit Transactions Act of 2003*, Federal Trade Commission, December 2004, at 22-31 (hereinafter “2004 FTC 319 Report”) available at <http://www.ftc.gov/reports/facta/041209factarpt.pdf>.

## **1.1 Overview of the Credit Reporting Industry<sup>4</sup>**

The U.S. credit reporting industry consists primarily of three national CRAs that maintain a wide range of information on approximately 200 million consumers.<sup>5</sup> Creditors and others voluntarily submit information to these centralized, nationwide repositories of information. This information is then consolidated into consumer reports and credit reports. Users of credit reports analyze the data and other information to assess the risk posed by credit applicants, often using sophisticated predictive models called credit scores.<sup>6</sup> This flow of information enables credit grantors and others to make fast and generally reliable decisions about a consumer's eligibility for various products and services, allowing consumers to obtain credit within minutes of applying.

The CRAs obtain records related to consumers' credit history from data furnishers including creditors, collection agencies, and public sources. There are roughly 30,000 data furnishers that provide this information on a voluntary basis.<sup>7</sup> Each record is attached to identifying information such as name, Social Security number ("SSN"), address, or birth date.<sup>8</sup> The CRAs organize these records into "files," which refer to all data that the CRA believes belong to the same person. The CRAs attempt to maintain exactly one file for every credit-using consumer and to

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<sup>4</sup> For a more complete discussion of the Fair Credit Reporting Act of 1970 (FCRA) and the relevant amendments of 1996 and the 2003 FACT Act, please see the 2004 FTC 319 Report or *40 Years of Experience with the Fair Credit Reporting Act: An FTC Staff Report with Summary of Interpretations (July 2011)* (hereinafter "2011 FTC FCRA Report") available at <http://www.ftc.gov/os/2011/07/110720fcrareport.pdf>.

<sup>5</sup> See Robert B. Avery, Paul S. Calem, Glenn B. Canner & Raphael W. Bostic, *An Overview of Consumer Data and Credit Reporting*, Federal Reserve Bulletin (Feb. 2003), (hereinafter "2003 FRB Study"); and also *The Accuracy of Credit Report Information and the Fair Credit Reporting Act: Hearing Before the Senate Committee on Banking, Housing, and Urban Affairs, 108th Cong. (July 10, 2003)* (statement of Stuart K. Pratt, Consumer Data Industry Association ("CDIA")) (hereinafter "Statement of Stuart K. Pratt").

<sup>6</sup> Scoring products (sometimes referred to as "risk scores" or "credit scores") are predictive models based on analyses of historical consumer credit history and performance data. When a consumer applies for credit or insurance, the models use information in the consumer's credit history to predict the risk posed by that consumer. The risk is typically summarized in a numerical score.

<sup>7</sup> See Statement of Stuart K. Pratt, *supra* fn 4. These figures and the discussion that follows were also based on conversations between FTC staff and representatives of the three national CRAs.

<sup>8</sup> Identifying information is used to link information provided by different furnishers and to determine to which consumer file a subscriber's inquiry pertains. Although the SSN is a unique identifier, it is often missing from consumer credit information and errors in recording SSNs occur. The CRAs do not require that subscribers submit a SSN as part of an inquiry and some creditors do not require consumers to provide a SSN as part of a credit application. Errors in SSNs may arise when a consumer does not know his or her number when filling out an application, from illegible handwriting or faulty transcription, or from mistyping the number when entering it into a database. Because of these problems, the CRAs do not rely exclusively on SSNs in their matching procedures. Instead, the CRAs will rely on SSNs that do not match if the match on other data elements is strong enough. (See 2004 FTC 319 Report).

include as many of that consumer's accounts and other records in the file as possible.

Instead of the historic reciprocal system in which data furnishers shared information, the CRAs sell information to "subscribers." Subscribers may be the final users of consumer reports, or they may be "resellers," entities that purchase consumer reports from the national CRAs and sell the information to final users. In addition, these subscribers may or may not provide information about their own consumers to the CRAs. Most large banks and finance companies furnish information about their credit accounts to all three of the national CRAs, though they may be a subscriber of only one CRA.<sup>9</sup>

Consumer information maintained by the national CRAs can be divided into five general categories: (1) Identifying information including name, address, birth date, SSN, and previous/alternate names and addresses; (2) Credit account information including information about current and past credit accounts such as mortgages, car loans, credit cards, and installment payments; (3) Public records such as bankruptcies, foreclosures, civil judgments, and tax liens; (4) Collection accounts, which include unpaid debts (such as medical bills) that have been turned over to collection agencies; and (5) Inquiries (subscriber requests to access a consumer credit report).

In many cases, when a subscriber requests a consumer's credit report, it also receives a credit score that summarizes the consumer's credit history. There are many different types of credit scores in use today. Each of the national CRAs offers a variety of scores, such as scores that measure general creditworthiness, scores that are specific to certain types of credit such as auto loans or mortgages, and credit-based scores used to measure risk for auto or homeowners insurance, default risk, or bankruptcy risk. Some of these scores are developed by the CRAs themselves (e.g., VantageScore) and others are developed by third parties (e.g., the Fair Isaac Corporation developed and produces the widely used "FICO" scores).

Since 1996, the FCRA has also imposed certain accuracy and reinvestigation duties on both the furnishers of information to CRAs and the users of reports. For example, users of consumer reports (i.e., creditors who use report information provided by CRAs) are required to send notice to consumers if the consumer's credit report was used to deny credit (known as an "adverse action notice"). The 2003 FACT Act imposed additional reinvestigation duties on furnishers. These amendments also recognize that furnishers – the original source of the information – have a critical role to play in the overall accuracy of consumer report information. Thus, Section 623 of the FCRA requires furnishers to investigate disputes received from CRAs and to correct and update information provided to CRAs that they later learn is inaccurate. Furnishers are also required to investigate and respond to disputes made directly to them by consumers regarding the accuracy of their information.

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<sup>9</sup> See Statement of Stuart K. Pratt, *supra* fn 4.

## 1.2 The Dispute Process

When a consumer reviews his or her credit report and identifies an item that the consumer believes is an error, Section 611 of the FCRA gives the consumer a right to dispute such items.<sup>10</sup> The consumer initiates a dispute by notifying the CRA.<sup>11</sup> The FTC instructs consumers:

“Tell the credit reporting company, in writing, what information you think is inaccurate. Include copies (NOT originals) of documents that support your position. In addition to providing your complete name and address, your letter should clearly identify each item in your report you dispute, state the facts and explain why you dispute the information, and request that it be removed or corrected. You may want to enclose a copy of your report with the items in question circled. Your letter may look something like the one below. Send your letter by certified mail, “return receipt requested,” so you can document what the credit reporting company received. Keep copies of your dispute letter and enclosures.”

“Tell the creditor or other information provider, in writing, that you dispute an item. Be sure to include copies (NOT originals) of documents that support your position. Many providers specify an address for disputes. If the provider reports the item to a credit reporting company, it must include a notice of your dispute. And if you are correct — that is, if the information is found to be inaccurate — the information provider may not report it again.”<sup>12</sup>

The investigation of the dispute includes consideration by the CRA of “all relevant information” submitted by the consumer, which the CRA must also provide to the original furnisher of the disputed information for review by the furnisher. The CRA generally has 30 days to complete its investigation (with an additional 15 days if the consumer sends more information during the initial dispute period – thus up to 45 days), after which it must record the current status of the information, or delete it if it is found to be inaccurate or unverifiable. The CRA must then report the results of the investigation to the consumer.<sup>13</sup> If the investigation does not resolve the dispute, the consumer may file a statement with his or her version of the facts, which must then be included in any subsequent report that includes the disputed item.<sup>14, 15</sup>

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<sup>10</sup> 15 U.S.C. § 1681i.

<sup>11</sup> Each of the three national CRAs provides an option for consumers to file a dispute online: Equifax (<https://www.ai.equifax.com/CreditInvestigation/>), Experian (<http://www.experian.com/disputes/main.html>), and TransUnion (<http://www.transunion.com/personal-credit/credit-disputes/credit-disputes.page>).

<sup>12</sup> <http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre21.shtm>.

<sup>13</sup> To address the problem of recurring errors, the FCRA prohibits CRAs from reinserting previously deleted information into a consumer’s credit file without first obtaining a certification from the furnisher that the information is complete and accurate, and then notifying the consumer of the reinsertion. 15 U.S.C. § 1681i(a)(5).

<sup>14</sup> Each scoring model may treat disputed information differently and the exact nature of the scoring model algorithm is proprietary. Specific information currently under investigation may not be used in calculating a credit score (e.g., if a consumer disputes a particular late payment, that late payment is not considered when the credit score is determined).

To promote compliance with the accuracy requirements and aid consumers in the dispute process, the FTC educates businesses and consumers about the FCRA. There are a number of business publications available on the FTC website to provide guidance for data furnishers and users of credit reports.<sup>16</sup> The FTC continues to educate consumers about the FCRA and the mechanisms for identifying inaccuracies in their reports. The agency's consumer publications include: *Building a Better Credit Record*,<sup>17</sup> which teaches consumers how to legally improve their credit reports, deal with debt, and spot credit-related scams; *Credit Repair: How to Help Yourself*,<sup>18</sup> which explains how to improve your creditworthiness; and *How to Dispute Credit Report Errors*,<sup>19</sup> which explains how to dispute and correct inaccurate information on a credit report and includes a sample dispute letter.

### ***1.3 Importance of Studying Credit Reporting Accuracy***

Once used primarily for granting loans, the information held by CRAs and the credit scores derived from it are increasingly used in other transactions, such as the granting and pricing of telecommunications services and insurance. Given the wide use of credit reports for multiple purposes, the accuracy and completeness of the data contained in them is of great importance to consumers and the economy.

For products or services where the credit rating determines approval or denial, an inaccuracy in a credit report could cause the consumer to be rejected rather than accepted. For many products, such as credit and insurance, consumer credit reports are widely used to set pricing or other terms, depending on the consumer's risk ("risk-based pricing"). For these products, an inaccuracy could cause the consumer to pay a higher price. At the market level, accurate and complete credit ratings provide lenders with information about borrowers' credit history so they can more precisely estimate default risk and tailor their interest rates and other credit terms to the risk presented by the borrower. For example, by identifying consumers with a good credit record, creditors can offer these customers a lower interest rate that reflects their lower default risk. If credit information were frequently missing or wrong, then a good credit record would not be such a strong signal of a consumer's low default risk.<sup>20</sup>

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<sup>15</sup> The National Consumer Law Center argues that even when the dispute process works as specified by the FCRA, the current automated nature of data furnishing and dispute investigation leads to some errors that cannot be effectively disputed. The FTC 319 study does not address this particular issue. See Chi Chi Wu, *Automated Injustice: How a Mechanized Dispute System Frustrates Consumers Seeking to Fix Errors in their Credit Reports* (National Consumer Law Center Report January 2009) available at [www.consumerlaw.org](http://www.consumerlaw.org).

<sup>16</sup> See *Credit Reports: What Information Providers Need to Know*, available at <http://business.ftc.gov/documents/bus33-credit-reports-what-information-providers-need-know> and *Using Consumer Reports: What Employers Need to Know*, available at <http://business.ftc.gov/documents/bus08-using-consumer-reports-what-employers-need-know>

<sup>17</sup> <http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre03.shtm>.

<sup>18</sup> <http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre13.shtm>.

<sup>19</sup> <http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre21.pdf>.

<sup>20</sup> Thus, the CRAs have incentives to provide accurate information to lenders so that credit is extended to the appropriate people at the appropriate rate. There may be some asymmetry to the

There are a number of reasons why a consumer credit report may not be a complete and accurate representation of a consumer's credit history. First, there may be problems with the data provided by a furnisher. A data furnisher may send information to the CRA that is incorrect, may provide incomplete information, or may not provide any information at all. Second, there may be problems with assigning data to the proper consumer files (file building). A data furnisher may send correct information, but the CRA may not associate it with the correct person. Third, there may be problems with file retrieval. A CRA may send a report to a subscriber that pertains to the wrong person or contains information that does not belong to that person. The design of the FTC 319 Study aids consumers in identifying when the credit report is not accurate due to incorrect data or file building issues, but it is not designed to address issues of file retrieval or lack of reporting by some data furnishers.<sup>21</sup>

## **1.4 Prior Studies of Accuracy and Completeness**

Several empirical studies have already been conducted on the accuracy and completeness of credit report data. These studies provide some useful information about the accuracy and completeness of credit reports, but none is comprehensive. Accuracy in a credit report is a complex issue and the nature of generating a report presents challenges in defining and identifying errors. The 2004 FTC 319 Report summarizes the results of the previous studies on credit reporting accuracy in great detail; here we provide a brief summary of the literature.<sup>22</sup>

### **1.4.1 Early Studies Using CRA Data or Consumer Surveys**

One of the early methods for studying accuracy used CRA dispute data as a proxy for accuracy and found a relatively low rate of error. In 1992, the Associated Credit Bureaus (later Consumer Data Industry Association, or "CDIA") commissioned Arthur Andersen & Company to perform a study about credit report accuracy. Using credit applicants who had been denied credit, the Andersen Study found that only 8% requested a copy of their report and 2% of those denied credit disputed information contained in their report. Following the dispute, 3% of the people who received copies of their report had the original decision to deny credit reversed. The Andersen Study suggests that 0.24% of applicants that were denied credit had errors on their credit report that lead to a denial of credit.

Next, the U.S. Public Interest Research Group ("US PIRG") conducted studies in 1998 and 2003 that asked consumers to review their own credit reports for errors.<sup>23</sup> A survey conducted by

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incentives, however, as it is more costly to extend credit to a consumer who defaults than to miss an opportunity to extend credit to a low-risk consumer.

<sup>21</sup> Although the study participants may be aware that there is information missing from their credit report (e.g., a specialty store credit card), the research associate will only learn data is missing if the participant shares that information.

<sup>22</sup> In addition, see Staten and Cate (2004) for an overview of the literature.

<sup>23</sup> Golinger, John and Edmund Mierzwinski (1998). *PIRG: Mistakes do happen: Credit Report Errors Mean Consumers Lose*. U.S. PIRG.; Cassady, Alison and Edmund Mierzwinski (2004). *Mistakes do happen: A Look at Errors in Consumer Credit Reports*. National Association of State PIRGs (U.S. PIRG).



Consumers Union in 2000 used a similar method; a small number of Consumers Union staff reviewed their personal credit reports and reported alleged inaccuracies.<sup>24</sup> In 2002, the Consumer Federation of America together with the National Credit Reporting Association (“the CFA study”) examined credit information requested by mortgage lenders.<sup>25</sup> In particular, the CFA study looked at differences in the credit score reported by each CRA and found 29% of files had a difference of 50 points or greater between the highest and lowest score, and 4% of files had a difference of 100 points or greater between scores.<sup>26</sup> Generally, these studies suggest high error rates (for example, the oft-cited PIRG 2004 statistic that “79% of the credit reports surveyed contained either serious errors or other mistakes of some kind” (p. 4)).

In response, the CDIA provided testimony to Congress in July 2003. The CDIA reported industry-wide data on file disclosures (sending reports to consumers who have been denied credit) and disputes from its nationwide consumer reporting system members. The CDIA estimated that between 10.5% and 54% of approximately four million disputes each year are in fact errors on the credit reports. Taken together with the number of disclosures (16 million) the testimony of the CDIA implies that 2.5% to 13.5% of consumer file disclosures lead to a correction of errors.<sup>27</sup> The dispute data is valuable because it focuses on an important segment of the population (consumers who have been denied credit) and how often significant errors occurred.<sup>28</sup>

In its 2003 review of data on credit report errors, the Government Accountability Office (“GAO”) concluded that the current consumer survey research (i.e., U.S. PIRG and Consumers Union studies) was of limited value in determining the frequency of errors in credit reports.<sup>29</sup> As the GAO report noted, the surveys did not use a statistically representative sample and counted any inaccuracy as an error, regardless of the impact the error might have. The GAO report also called into question the reliability of the statistics provided by disputes of consumers who had

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<sup>24</sup> Consumer Reports (2002). *Credit reports: How Do Potential Lenders See You?*

<sup>25</sup> Consumer Federation of America and National Credit Reporting Association (2002). *Credit Score Accuracy and Implications for Consumers*.

<sup>26</sup> The CFA study attributes the score differences to differences in the information contained in consumer files, rather than differences in scoring models. The CFA study utilized both a large sample (>500,000 files) for general analysis and a smaller sample (1,500 files) for more in-depth analysis. The CFA noted roughly 10% of their in-depth sample cases had an additional CRA report. The additional report was either (a) for the wrong person; (b) due to variations in the person’s name; or (c) a report containing a mixture of credit information that only partially belonged to the credit applicant. Another 10% of the in-depth sample cases were missing a credit score from at least one CRA.

<sup>27</sup> CDIA’s testimony suggests that one quarter of disclosures lead to disputes. If the CDIA reports that between 10.5% and 54% of the disputes are actual errors, then one-quarter of these percentages represent the percentage of all disclosures that are considered errors.

<sup>28</sup> The CDIA noted at the time of the testimony (2003) that most of the consumers who request their credit report do so in response to an adverse action notice.

<sup>29</sup> General Accounting Office, Report No. GAO-03-1036T, *Consumer Credit: Limited Information Exists on the Extent of Credit Report Errors and their Implications for Consumers* (July 31, 2003) (hereinafter “GAO Report”).

been denied credit (i.e., the Andersen study and the CDIA cited statistics). The use of dispute data relies on assumptions about whether those consumers who receive copies of their reports in the context of adverse action would be representative of the population as a whole. It also relies on the assumption that a consumer who receives a report with an important error or omission identifies the problem and disputes it. The GAO report also notes that differences in scores across CRAs may not necessarily be indicative of errors (i.e., the CFA study). Data is furnished to CRAs voluntarily and it is possible that one CRA may have more or less information about a particular consumer than another CRA.

#### **1.4.2 Federal Reserve Board Studies**

The 2003 Federal Reserve Board (“FRB”) Study examined the credit files for a nationally representative random sample of 248,000 individuals as of June 1999 from one of the national CRAs.<sup>30</sup> As the 2003 FRB study authors note, because the study did not involve consumer assessment, it could not necessarily identify actual errors. Instead, the authors found that creditors failed to report the credit limit for about one-third of the open revolving accounts in the sample at the time (which might potentially lower the credit score);<sup>31</sup> approximately 8% of all credit accounts were not currently reported but had a positive balance when last reported (meaning the data is inaccurate as reported); and there were inconsistencies in the reporting of public record information such as bankruptcies and collections. The GAO Report noted that, because the reports came from one CRA, the findings of the 2003 FRB Study may not be representative of the other CRAs.

In 2004, the FRB released a follow-up study using a nationally representative sample of 301,000 individuals drawn as of June 30, 2003.<sup>32</sup> It found that relative to the 1999 data used in the 2003 FRB Study, credit reports contained better reporting of credit limits (only 14% of revolving accounts had missing credit limit information). The FRB also obtained the CRA’s credit score for 83% of the files in the sample. The researchers used this data to develop an approximation of the credit-scoring model to determine the effects of correcting a data problem or omission. The 2004 FRB Study reported that, in most cases, the problems or omissions had only a small effect on credit scores because most consumers have a large number of accounts. Thus, the impact of an error on one account is relatively small. Also, the authors note that credit scoring models already take data problems into account. There are two important caveats to the findings of this study. First, the consumers who experienced the most improvement in their scores were the ones for whom the improvement most mattered: those with lower scores or near the boundary for

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<sup>30</sup> Individuals and creditors were not identified by name or other personal identifier, but were assigned unique codes so that all credit files about an individual, and creditor data across files, could be analyzed. See 2003 FRB Study, *supra* fn 4.

<sup>31</sup> Open revolving accounts are credit accounts where the consumer may defer payment on part of the balance and interest is charged on the remaining balance (e.g., credit cards). When the credit limit is missing, it is reportedly common practice to use the highest historical balance in place of the credit limit. Because this is a downward-biased estimate of the actual credit limit, it leads to an upward-biased estimate of credit utilization rates, lowering the credit score.

<sup>32</sup> See Robert B. Avery, Paul S. Calem, and Glenn B. Canner, Credit Report Accuracy and Access to Credit, Federal Reserve Bulletin (Summer 2004), (hereinafter “2004 FRB Study”).

classification in the subprime market. Second, as the authors note, some of the errors that might more dramatically affect a credit score – such as incorrect accounts or public record information – were not captured by the study. It is also important to note that while this approach does not involve consumer assessment and thus cannot identify whether a particular item in a credit report is erroneous, it does provide valuable information about the completeness and consistency of credit report data.

### **1.4.3 Federal Trade Commission Pilot Studies**

To fully determine whether information in a credit report is accurate and complete takes the cooperation of multiple entities: consumers, because they are the best source for identifying certain kinds of errors (such as whether an account belongs to them); data furnishers, because they can verify or refute what a consumer believes to be true about a particular account; and the CRAs, because they are the repositories for credit report data. Most of the previous studies rely on a single source (consumer, data furnisher, or CRA) to draw conclusions about accuracy. Participation of all three of these key stakeholders is crucial to gaining a more precise understanding of accuracy in credit reports. The FTC 319 Study was designed to be the first to engage consumers, data furnishers, and the CRAs.

As part of the FTC 319 Study, the Bureau of Economics conducted two pilot studies described in the 2006 and 2008 reports to Congress.<sup>33</sup> These pilot studies helped to clarify certain issues of studying accuracy, such as sample selection and what constitutes an actual error. The previous FTC reports to Congress illustrate a more complete methodology for assessing inaccuracies in credit reports; that is, the involvement of the consumer, the data furnishers, the CRAs, and the use of the FCRA dispute process to identify actual errors.

### **1.4.4 PERC Study of Accuracy**

In May 2011, the private consulting group Policy & Economic Research Council (PERC) published a study on credit report accuracy funded by the CDIA.<sup>34</sup> This study also engaged consumers, data furnishers, and CRAs. Their methodology improved on previous studies by incorporating the relevant consumers in identifying potential errors and relying on the consumer dispute resolution process to assess the disputed items.<sup>35</sup> As noted in the PERC Study and

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<sup>33</sup> *Report to Congress under Sections 318 and 319 of the Fair and Accurate Credit Transactions Act of 2003*, Federal Trade Commission, December 2006, (hereinafter “2006 FTC 319 Report”) available at [http://ftc.gov/reports/FACTACT/FACT\\_Act\\_Report\\_2006.pdf](http://ftc.gov/reports/FACTACT/FACT_Act_Report_2006.pdf) and *Report to Congress under Sections 318 and 319 of the Fair and Accurate Credit Transactions Act of 2003*, Federal Trade Commission, December 2008, (hereinafter “2008 FTC 319 Report”) available at <http://ftc.gov/os/2008/12/P044804factarptcongress.pdf>.

<sup>34</sup> Turner, Michael A., Robin Varghese, and Patrick D. Walker (2011). *U.S. Consumer Credit Reports: Measuring Accuracy and Dispute Impacts* (hereinafter the “PERC study”). Policy and Research Council (PERC).

<sup>35</sup> The PERC study is clear on the issue regarding verified errors: “When an error is verified it is not known whether or not an actual error was identified but only that some data modification has occurred.” (Footnote 18 PERC study).

discussed in more detail in Appendix A, the methodology used by PERC to study accuracy is similar in many ways to the FTC pilot study methodology.<sup>36</sup>

PERC contracted with Synovate, a global market strategy firm, to recruit participants and conduct an online interview. Synovate recruited participants from their panel of consumers using a quota sampling method to match the U.S. Census estimates of age, household income, race and ethnicity, marital status, and gender.<sup>37</sup> Synovate contacted a total of 57,466 individuals and produced a final sample of 2,338 participants (a response rate of 4.1%). Participants were provided with a Guidebook and a Frequently Asked Questions (“FAQ”) sheet that served as educational tools to assist the consumer in identifying potential errors. Each participant obtained at least one credit report from one of the CRAs with an accompanying VantageScore. After reviewing the credit report(s) on their own, participants reported any potential error(s) to Synovate and were instructed to file a dispute with the relevant CRA.<sup>38</sup>

In order to measure the impact of changes resulting from the FCRA dispute process, PERC used a “real time rescore” procedure.<sup>39</sup> When a study participant completed the dispute process, the relevant CRA provisionally scored the consumer’s new credit report prior to making any changes to the report.<sup>40</sup> Upon considering the dispute result(s) conveyed by the new credit report, the CRA further scored the new report in keeping with the indicated changes. PERC used this score difference to measure the impact of any disputed items that were changed as a result of the FCRA dispute process.

PERC uses a single credit report as the unit of observation for analysis and statistics, even though most consumers have three credit reports. The study design and use of real time rescoring creates a carbon copy issue for the PERC study.<sup>41</sup> In order to avoid any complication from the

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<sup>36</sup> PERC conducted a pilot study, made modifications, and then conducted the full study. We only review certain details of the full study here.

<sup>37</sup> Because credit score is not a variable included in Synovate’s information, it was not possible to use credit score as a target for recruitment. Panelists received the credit score information after agreeing to participate.

<sup>38</sup> Participants who identified potential errors but did not dispute were provided with reminders and further incentives to file disputes.

<sup>39</sup> PERC participants who filed disputes were processed by the same consumer specialists who handle disputes from consumers who did not participate in the study. See PERC: *General Response to Criticisms of Recent PERC Report: U.S. Consumer Credit Reporting: Measuring Accuracy and Dispute Impacts* (August 2011). One of the three national CRAs was able to identify that the consumer filing a dispute was a participant in the PERC study on accuracy. When results of the dispute process were compared across the two CRAs that could not identify participants and the CRA that could identify participants, no noticeable deviations were found.

<sup>40</sup> The new credit report was drawn for PERC participants after the completion of the dispute process, thus generally up to 30 days after the initial report was drawn.

<sup>41</sup> When a consumer disputes items at multiple CRAs and a modification is made by one CRA, the other national CRAs are provided with “carbon copies” of the modified information. The other CRAs are not required to use the information. If a consumer has disputed certain information at both CRA A and CRA B and CRA A resolves the issue first, then CRA B might

carbon copy issue, most consumers in the PERC study (62%) drew only one credit report. Of all reports examined, PERC participants identified potential errors in 19.2 % of the reports. The actual dispute rate, however, was lower; 12.7% of examined reports resulted in a participant disputing information (participants indicated they intended to dispute another 2.8% of the examined reports). Of the disputed tradelines, 86% were modified in some way in response to the dispute process.

PERC distinguishes between disputes that are possibly material (i.e., if the disputed items was corrected in accordance with the consumer dispute, then the credit score may be impacted) and not material (header data relating to name, address, or employment). It finds 12.1% of all credit reports examined have possibly material errors. After completion of the dispute process and rescoring of the modified reports, PERC finds that 3.1% of all reports examined experienced an increase in credit score of at least 1 point. PERC notes that only one half of one percent (0.51%) of reports examined had credit scores that changed “credit risk tiers” as a result of the dispute process.<sup>42</sup>

There are a number of notable similarities and differences between the PERC study methodology and the FTC 319 Study on accuracy. The PERC study explicitly states the methodology used in the FTC pilot studies provide the “most complete research design” prior to the PERC study and that “the FTC’s pilot studies have a number of similarities with the methodology employed in [the PERC] study.”<sup>43</sup> In the following sections we describe the methodology of the FTC 319 study and present the results. In Section 4 and Appendix A, we return to a discussion of the PERC study and make comparisons and distinctions between the two studies.

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incorporate the modified information into the consumers report prior to PERC’s real time rescoring of the new report. Thus, the PERC study design calls for two-thirds of the participants to draw only a single report and avoid the potential for overlooking changes due to the carbon copy issue. The FTC study does not face this issue due to the use of “frozen files” described in more detail below.

<sup>42</sup> These “credit risk tiers” are defined using three sets of VantageScore ranges based on research carried out by VantageScore.

<sup>43</sup> PERC study, p. 17.

## 2 Methodology

### 2.1 Overview of Study Design

The overall design of this study was informed by the results of two pilot studies.<sup>44</sup> These preliminary studies demonstrated the general feasibility of a methodology that employs consumer interviews but also revealed several challenges for a national study. These challenges included identifying methods for achieving a nationally representative sampling frame, increasing the response rates, and easing the burden on the consumer of completing the study. In both pilot studies, consumers with relatively low scores were under-represented compared to the national average for credit scores.

FTC staff devised a procedure for obtaining a nationally representative sample of consumers' credit files with enough information to generate credit reports and related scores at the three national CRAs. In total, 1,003 consumers participated in the study and reviewed their credit reports with an expert under contract to the FTC, though only 1,001 were deemed to have provided reliable information.<sup>45</sup> With the consumers' permission, the contractor obtained credit reports from the three national CRAs and engaged the participants in an in-depth review of their credit reports. The focus of the review was to identify potential errors that could have a material effect on a person's credit standing. Material errors are described in more detail below, but generally a 'material error' is an inaccurate item falling within the categories used to generate a credit score.<sup>46</sup>

All credit reports with alleged material errors were sent to an analyst at the Fair Isaac Corporation (FICO) for an initial rescoring that provisionally treated all of the consumer's allegations as true. After allowing for a reasonable amount of time for the dispute process (a

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<sup>44</sup> For details on the two pilot studies, please see the 2006 FTC 319 Report and the 2008 FTC 319 Report.

<sup>45</sup> During January 2010, the FTC solicited competitive bids for performing certain work for the 319 FACT Act Study. Appendix B gives the Statement of Work. The complete solicitation may be found on *FedBizOps*, FTC-10-Q-0007, January 22, 2010. The FTC's study contractor is a research team comprised of members from the Center for Business and Industrial Studies at the University of Missouri-St. Louis (UMSL), the Norton School of Family and Consumer Sciences at the University of Arizona (UA), and the Fair Isaac Corporation (FICO) [hereafter the entire research team is referred to as "the contractor"]. UMSL and UA interacted with consumers and reviewed credit reports while analysts at FICO rescored credit reports when consumers planned to file disputes. This same research team was employed for the two pilot studies. The credentials of the research team are appended to the 2008 FTC 319 Report. The report of the contractor summarizing its analysis of the full study data is included as Appendix D. Due to slight variations in definitions of confirmed errors (described below) there are minor discrepancies in the numbers reported in the attached contractor's report and this FTC report. The overall findings are consistent.

<sup>46</sup> In this report, the phrase "confirmed material error" refers to material information on a credit report that a consumer alleges to be erroneous in this study and is altered as a result of the FCRA dispute process (discussed below). The study will provide an estimate of the frequency of confirmed material error types based on our sample.

minimum of eight weeks, which is considerably longer than the 30-day FCRA time allowance for dispute resolution), the contractor obtained new credit reports to assess whether the alleged errors disputed by the consumer were changed by the CRAs. These redrawn reports were sent to FICO for a second rescoring if some, but not all, of the alleged material errors were confirmed by the dispute process. Two important features of this study are: (1) the categorization and counting of alleged and confirmed material errors, and (2) FICO's rescoring of credit reports to measure the impact of such errors on a consumer's credit standing.

## **2.2 Stratified Sampling Procedure**

The relevant population for the study is comprised of adults who have credit histories with the national CRAs. FTC staff first obtained a random sample of 200,100 individuals from the databases of the CRAs.<sup>47</sup> The information in this sample is comprised of study ID number (assigned by the CRAs), zip code, gender, age, and initial VantageScore credit score ("VantageScore").<sup>48</sup> It is important to note that credit-related data were maintained separately from personal identifying information (see further discussion below). The random sample from the CRAs represents the pool of individuals selected for *possible contact* and constitutes the "master list" for the study.<sup>49</sup>

The master list was then adjusted to ensure that the study would not disproportionately draw its sample from any one of the three national CRAs. Specifically, the set of individuals from each CRA (initially, 66,700 from each) was randomly reduced so that the possible study contacts from a given CRA would be proportional to the relative size of its database. To achieve this goal, the sampling frame ultimately consisted of 174,680 individuals, with 37% coming from the largest CRA, 33% from the second largest, and 30% from the third. From this sampling frame, consumers were selected to participate in the study.

A key element of the study design was ensuring that the credit reports of the participants collectively conform to the national distribution of scores. The sampling frame of randomly selected consumers from the CRA databases was essential for this purpose. To generate the national distribution of credit scores, FTC staff categorized the records in the sampling frame by

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<sup>47</sup> In addition to providing enough data to estimate the distribution of credit scores, the use of a large random sample provided by the CRAs minimizes the likelihood that the CRA would be able to identify a study participant.

<sup>48</sup> VantageScores provided by the CRAs were used to generate a sample representative of the national distribution of consumers with credit reports and VantageScores. To determine whether modifications resulted in a score changes, analysts at FICO scored the initial credit reports and rescored the reports with modifications. Credit score products generated by FICO are used by the majority of lenders. There are a number of differences between VantageScore and FICO credit scores the first of which is the different scales used by the credit scoring models. VantageScores range from 500-999 and FICO credit scores range from 300 to 850.

<sup>49</sup> The information in the master list was provided voluntarily and confidentially by the CRAs. We thank the CRAs for providing this information in connection with the mandated study; these data have laid the foundation for developing a nationally representative sample of consumers and credit reports.

VantageScore. Using 25 bins representing 20 point VantageScore ranges (500-519, 520-539, 540-559, etc.), FTC staff were able to roughly determine the national distribution of VantageScores. For example, 2.99% of the sampling frame had VantageScores in the 500-519 range, 3.97% had VantageScores in the 800-819 range, and 2.4% had scores of 940-959. Given the desired number of participants (1,000), FTC staff calculated a target number of participants from each VantageScore range in order for the final participant sample to be nationally representative of VantageScores. See Table 2.1 for the distribution of VantageScores from the sampling frame and the relevant goals for the study sample.

**Table 2.1 Distribution of VantageScores**

<b>VantageScore Credit Score Range</b>	<b>Frequency</b>	<b>Percent of Sampling Frame</b>	<b>Sample Goal (out of 1,000)</b>
<b>500-519</b>	5,220	2.99%	30
<b>520-539</b>	4,840	2.77%	28
<b>540-559</b>	5,965	3.41%	34
<b>560-579</b>	6,974	3.99%	40
<b>580-599</b>	6,747	3.86%	38
<b>600-619</b>	6,971	3.99%	40
<b>620-639</b>	6,945	3.98%	40
<b>640-659</b>	6,961	3.99%	40
<b>660-679</b>	7,175	4.11%	41
<b>680-699</b>	7,973	4.56%	45
<b>700-719</b>	7,769	4.45%	45
<b>720-739</b>	7,439	4.26%	42
<b>740-759</b>	7,310	4.18%	42
<b>760-779</b>	6,095	3.49%	35
<b>780-799</b>	6,541	3.74%	37
<b>800-819</b>	6,942	3.97%	40
<b>820-839</b>	8,219	4.71%	47
<b>840-859</b>	10,125	5.80%	58
<b>860-879</b>	10,599	6.07%	61
<b>880-899</b>	10,527	6.03%	60
<b>900-919</b>	8,702	4.98%	50
<b>920-939</b>	6,222	3.56%	36
<b>940-959</b>	4,189	2.40%	24
<b>960-979</b>	2,754	1.58%	16
<b>980-999</b>	5,476	3.13%	31
	<b>174,680</b>	<b>100%</b>	<b>1,000</b>

The two pilot studies revealed that sending invitation letters to randomly selected consumers leads to over-representation of individuals with higher-than-average credit scores and under-representation of consumers with lower credit scores.<sup>50</sup> Lack of representation on credit score

<sup>50</sup> 2008 FTC 319 Report at 9 -10.



may lead to bias in the identification and confirmation of errors. Credit reports that have lower credit scores will generally have more entries with negative information and have a greater likelihood of containing items that may be challenged (i.e., there is a greater likelihood of identifying potential errors on credit reports with lower credit scores). The negative association between credit scores and errors was borne out in the pilot studies; consumers with below-average credit scores were more likely to identify potential errors on their credit reports and file disputes.

Due to variation in response rates, FTC staff sent proportionally more invitations to individuals with below-average credit scores to ensure that these consumers were adequately represented in the study.<sup>51</sup> As the set of participants developed over stages, VantageScores and the major demographic characteristics available (age, gender, and regional location via zip code) of the participant sample to date were analyzed and compared to the distribution of characteristics in the sampling frame.<sup>52</sup> The sampling was sequentially adjusted so that that the ultimate sample of approximately 1,000 participants would be representative in credit scores and in the stated demographics.<sup>53</sup> This conformity of credit scores with the sampling frame distribution helped ensure that the underlying credit reports of the solicited consumers were reflective of credit reports in general. The representative nature of the final sample is discussed in more detail in Section 3.

Table 2.2 summarizes the recruitment process. In line with the experience of the FTC pilot studies and the PERC study, the response rate is relatively low (approximately 3.9%). In reviewing credit reports, this study addresses matters that many consumers consider private and personal, possibly causing a reluctance to participate. As part of the study, FTC staff obtained information about non-respondents and in Section 3 we examine whether the participants are significantly different in certain characteristics from the non-participants.

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<sup>51</sup> For example, the response rate for consumers with a VantageScore between 500 and 519 was 2.2% and the response rate for consumers with a credit score in the 960-980 range was 6.7%. In addition to sending proportionally more invitation letters, the level of compensation differed. Potential participants with VantageScores below the sampling frame average were offered \$75 to participate and those with above-average VantageScores were offered \$25 to participate.

<sup>52</sup> For more detail on the methods used, see FTC Statement of Work attached as Appendix B.

<sup>53</sup> There were 10 mailing waves. The waves were constructed so that consumers in below-average credit score categories received more invitations to participate.

**Table 2.2 Recruitment**

Sampling frame (adjusted from random samples provided by CRAs)	174,680
Number of invitations/letters mailed (two sequential letters per invitation)	28,549
Number returned/ undeliverable (percent)	3,045 (10.7%)
Number of positive responses (registrants with contractor)	1,181
Number of respondents who had credit reports drawn and mailed to them	1,041
Number of phone interviews completed (final study participants)	1,003 (1,001 <sup>54</sup> )
Response rate (final study participants/potential participants)	3.9%
Number of credit reports reviewed during interviews	2,968 (2.97 reports/participant)

### **2.2.1 Privacy and Security of the Data**

In light of the potentially sensitive nature of the information being collected by this study, substantial care has been taken to establish procedures that protect the privacy and security of personal data. Chief among these procedures are the following: maintaining credit-related data separately from personal identifying information; requiring the FTC’s contractors to execute confidentiality agreements, including specific contractual obligations that address the privacy and security of the data; and limiting access to data to FTC and contractor personnel who needed to work with the data during the course of the study.

In connection with this study, at no point did FTC staff possess any personal identifying information of study participants, nor did staff know the identity of any participant or non-respondent. For the duration of the study, the only parties who possessed and reviewed personal identifying information, including certain credit report information, were: (1) the FTC’s study contractor, upon receiving the consumer’s permission to review the individual’s credit reports, and (2) the CRAs, which provided the master list of potential participants described above. Indeed, the CRAs collectively possess all data on the master list, while the FTC and its contractors received, respectively, only part of that information. The CRAs assigned abstract study ID numbers to all names on the master list. The FTC’s mailer (i.e., the contractor hired in this study to mail the invitation letters) received the names, addresses, and study IDs directly from the CRAs, and FTC study staff received study IDs, initial VantageScores, age, gender, and zip codes.

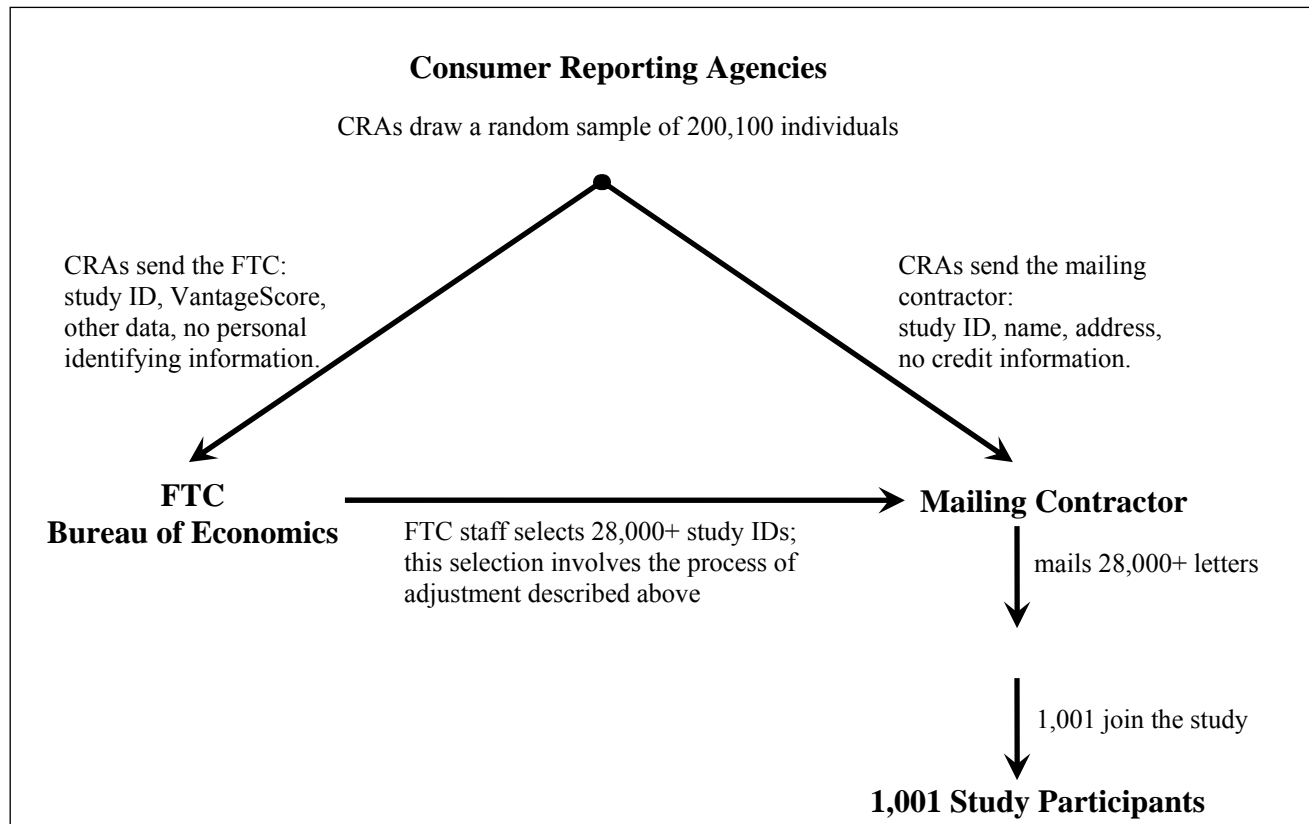
As consumers responded to the invitation letters and registered with the study contractor at UMSL, the individuals gave express permission for the contractor to review their credit reports for accuracy. In turn, the contractor communicated to FTC staff the participants’ study IDs,

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<sup>54</sup> Although 1,003 participants completed the interview, 2 participants were deemed to have provided unreliable data and are not included in further analysis.

along with certain redacted credit report information.<sup>55</sup> An individual’s study ID was the only identifier used in communications between staff and the FTC’s contractors about any respondent, potential respondent, or non-respondent. The FTC published a Privacy Impact Assessment (PIA), which gives a full review of the procedures used in this study. Importantly, the procedures ensured that the study does not collect, maintain, or review any sensitive information in identifiable form.<sup>56</sup> Figure 2.1 illustrates the development of the study sample and the safeguards with respect to personal identifying information and credit-related data.

**Figure 2.1 Development of the Study Sample**



### 2.3 Definition of Material Error

Before proceeding to the description of the study process, it is important to understand how a ‘potentially material error’ was defined throughout the study. As described above (and also in the contractor report), when a participant identified potential inaccuracies while reviewing the information in the credit report, the interviewer evaluated whether the alleged error met one of the “materiality standards.” An alleged error was considered potentially material if it contained.<sup>57</sup>

<sup>55</sup> Interested parties may consult the Statement of Work, provided in Appendix B.

<sup>56</sup> *Privacy Impact Assessment for the Registration Web Site for the National Study of Credit Report Accuracy*, October 2010. The document may be accessed at the FTC’s Web site: <http://www.ftc.gov/ftc/privacyimpactassessment.shtm> and is included as Appendix C.

<sup>57</sup> Reports were also considered to contain alleged errors requiring a dispute if they contained

- An alleged error in the number of negative items, such as late or missed payments
- An alleged error in the number of derogatory public records
- An alleged error in the number of accounts sent to collection
- An alleged error in the magnitude of an amount that was subject to collection
- An alleged error in the number of inquiries for new credit (hard pulls on file that occur when an individual applies for any type of credit)
- An alleged error in the total number of accounts with nonzero balances at any time in the reporting period
- An alleged error in the magnitude of an outstanding balance that is not attributable to normal monthly reporting variation
- Allegations of accounts on the credit report not belonging to (or cosigned by) the participant
- Dormant accounts shown as active and open if consumer had requested that the account be closed
- Duplicate entries of the same information such as late payments or outstanding obligations that were double counted in summaries of such information.

## **2.4 Study Process**

The invitation letter instructed consumers who wished to participate in the study to register online with UMSL at a secure website <http://ftcstudy.umsl.edu>. During registration with UMSL, consumers confirmed their willingness to participate and consented to the terms of the study. Next, consumers were directed to establish (or renew) accounts with FICO on the secure website <http://www.myfico.com>. The consumer accounts at myfico.com allowed the research associates at UMSL or UA to draw and print copies of the consumer's three credit reports and FICO credit scores. The research associates mailed a copy of the credit reports to the consumer along with a guide and checklist for understanding the credit report and preparing for the phone interview. These original credit reports were saved by FICO on the myfico.com website and are referred to as "frozen files" as explained in Section 2.5.1.

During the in-depth phone interview, the consumer reviewed each credit report with a study associate and identified any possible errors.<sup>58</sup> When consumers identified potential errors, the study associate informed the consumer whether the alleged error could be indicative of identity theft, have a significant impact on their credit score, or affect their terms of receiving credit. If the consumer did not identify potential errors, the study process ended for that participant. For the consumers who did identify a potential error, the study associate confirmed with the consumer the exact nature of the error and how the information should appear if corrected.

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evidence of possible identity theft, evidence of improper merging of files, or errors in header information (current/previous address, age, or employment). If a report had a potential error of this kind (and only this kind), the participant filed a dispute with the relevant bureaus, but the reports were not rescored as this information is not considered when generating a credit score.

<sup>58</sup> In some cases, the interviewer helped the consumer understand that information that the consumer thought was incorrect could be explained elsewhere in the report or in another report (e.g., if the consumer was confused about a particular company name associated with a tradeline).

If the potential error might affect the participant's credit score or was indicative of identity theft, the case was flagged as requiring dispute. The study team determined that cases with potential errors that were not classified as potentially material (such as a minor error in the spelling of a name or address) did not require filing a dispute for the purposes of the study.<sup>59</sup> If there was any doubt about whether an alleged error was potentially material, the case was flagged as requiring dispute. At the end of the phone interview, all consumers completed an exit survey to collect basic information about the consumer's demographic, household, and financial characteristics.

## ***2.5 Cases with Potentially Material Errors***

If a consumer identified an error that might affect her credit score, that report was determined to contain a potentially material error (see Section 2.3 for a description of what constitutes a material error). For those consumers with potentially material errors, the study associate prepared a dispute letter for each relevant CRA that stated the exact nature of the error and specified how the error should be corrected. The study associate mailed the stamped letters to the consumer who signed and appended the letters with identifying information (SSN and date of birth). A stamped postcard addressed to UMSL was also included in the packet. Consumers were instructed to mail the postcard at the same time they mailed the dispute letters so that the study team would receive confirmation of the disputes.

The study team waited a minimum of eight weeks after receiving confirmation that the dispute letters had been mailed to access new credit reports.<sup>60</sup> Because the FCRA dispute process generally takes 30-45 days, this waiting period provided ample time for the dispute process to be completed and any resulting modifications to appear on the consumer's credit reports. By drawing new credit reports following the disputes and comparing to the original credit reports that contained alleged errors, the study team identified whether modifications were made to the credit reports as a direct result of the disputes.

### **2.5.1 Rescoring and the Frozen File**

The original version of credit reports reviewed by the consumer and study associate during the phone interview is referred to as the "frozen file" because the original information is preserved at the time the credit report was drawn. This is necessary because other information on the report may change during the dispute process that is not due to the dispute (e.g., naturally occurring changes such as tradelines rolling off the report or balances changing).

In addition to mailing the packets of dispute letters and confirmation postcards to consumers, the study associate provided FICO with a copy of the relevant credit reports and the information that was disputed by the consumer. That is, in parallel with the actual dispute process, FICO analysts

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<sup>59</sup> Participants who identified only potential errors that were considered non-material were instructed on how to communicate with the CRAs to have the errors corrected. In some cases, the study associates helped consumers with this process. However, these alleged errors were not counted or analyzed for this study.

<sup>60</sup> Note that some consumers may only dispute with a single CRA so the use of plural for disputes is a generalization (i.e., the study associate would only draw a single new credit report if the consumer filed a single dispute).

were provided with written instructions on the changes the consumer alleged should be made to her report if the alleged errors were confirmed as inaccurate. FICO analysts pulled the frozen file of the disputing consumer and revised the frozen file to incorporate the requested changes. The FICO analyst then calculated a revised FICO® Score (“rescore”) for that report. The rescore represents the consumer’s FICO score on the credit report if every alleged error was corrected by the CRA as instructed by the consumer.

### **2.5.2 Redrawing Credit Reports and Possible Second Rescore**

After a minimum of eight weeks the study associate redrew the credit report for each CRA where the consumer had filed a dispute.<sup>61</sup> The new credit reports were compared with the original “frozen file” and the study associate determined whether the dispute process had resulted in changes to the credit report in response to the consumer dispute. Consumers were informed by the study team of the results of the dispute process as well as by the CRAs in keeping with FCRA requirements.

In situations where no changes were made to a file, the original FICO score on the frozen file is the relevant credit score for the individual report. Alternatively, if all the requested changes were made to a report, then the rescore (the revised FICO score with all changes imposed) is the appropriate credit score for the report. However, for those reports that only have some of the requested changes imposed, a second rescoring is necessary. The study associates evaluated the actual modifications made to the report and whether the changes could potentially affect a score (using the same criteria described above). If the imposed changes could affect the credit score, the study associate transmitted the details to FICO. A FICO analyst then revised the frozen file with the actual changes imposed on the report and calculated a second revised score, “rescore2.” If a report was rescored a second time, then “rescore2” is the relevant credit score for that report.

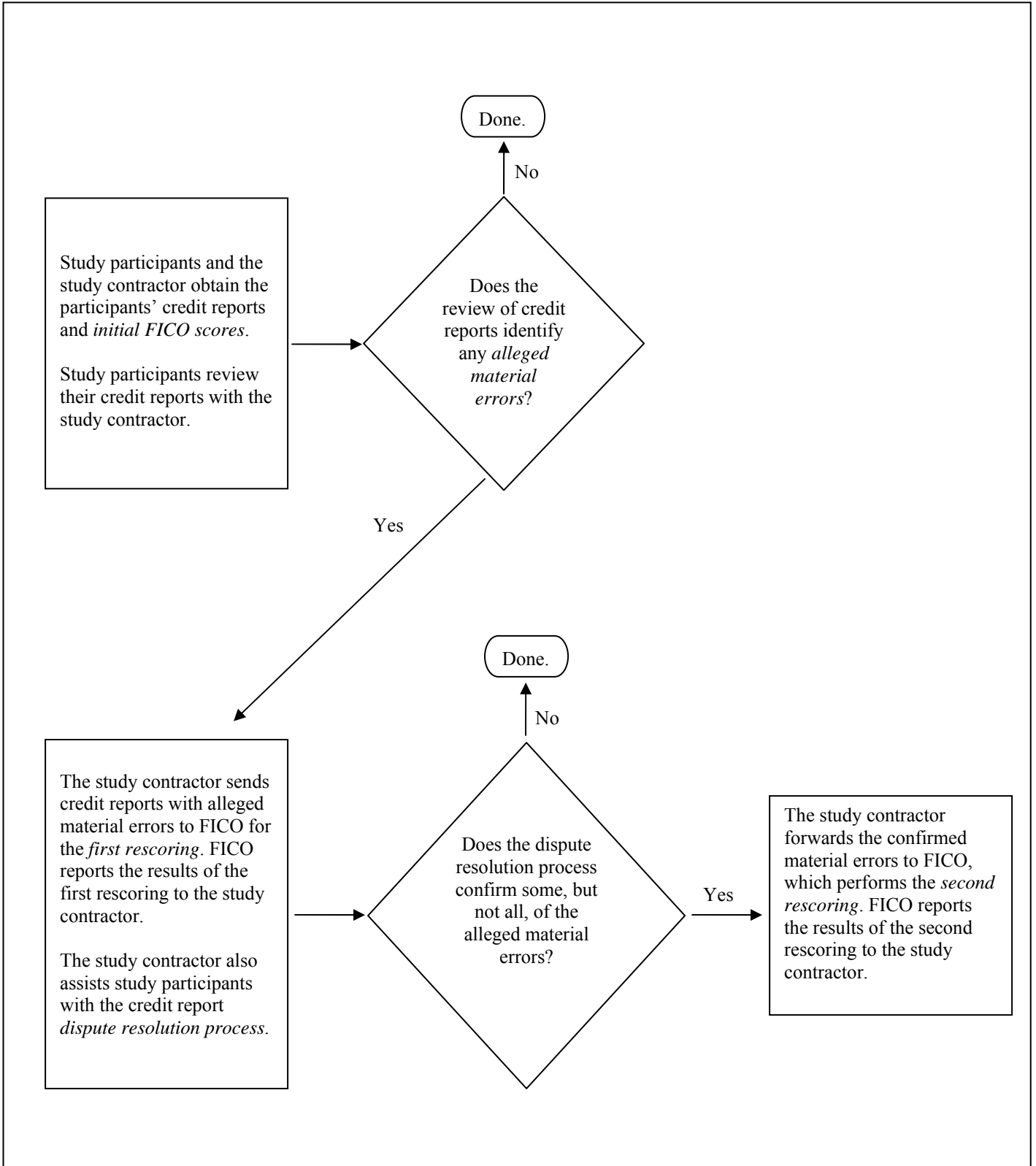
## **2.6 Summary of Study Process**

Appendix D (the contractor’s report) contains a detailed step-by-step summary of the study process. Figure 2.2 provides an illustration of how the study process worked.

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<sup>61</sup> In some cases, the study team/UMSL was unable to redraw new credit reports for the consumer. This was due to technical reasons, such as the consumer file not containing enough recent activity to be scored. The study team attempted to contact all the consumers with this issue so that the consumers could redraw their own report, but were unsuccessful in reaching all the relevant consumers. Overall there were a total of 13 consumers for whom UMSL was unable to redraw all three new credit reports (but for 12 of these consumers, the study team was able to draw one or two credit reports).

**Figure 2.2 Consumers Review of Credit Reports with Study Contractor**



### 3 Potential Non-Response Biases

A total of approximately 28,000 individuals from the sampling frame were solicited in ten monthly waves until approximately 1,000 consumers chose to participate in the study. With the goal of representing the national distribution of credit scores, FTC staff defined 25 VantageScore strata, each with a 20-point VantageScore range, and set participation targets for each stratum based on the distribution of VantageScores in the initial sampling frame. Because response rates differ by credit score, potential participants from some strata were oversampled in each wave of the sampling procedure. This oversampling procedure was designed so that the VantageScore distribution for the resulting study participants would match the national VantageScore distribution as closely as possible.

Recognizing that the rate of participation would likely be small and that non-response bias might therefore be a concern, we designed a procedure through which we could evaluate potential biases stemming from non-response.<sup>62</sup> More specifically, for each of the 28,000 individuals solicited, we collected the following information: VantageScore; other information typically found in credit reports, including number of active credit cards, total credit card balances, late payments (30, 60, and 90+ days late), number of tradelines currently delinquent, accounts or tradelines sent to collection, reported bankruptcy, liens on property, and the time span of the consumer's credit file; and demographic information, such as age, gender, and region of residence. This information allows us to determine whether individuals who chose to participate in the study differ significantly in their demographics and credit report information from individuals who were invited but decided not to participate ("non-respondents").<sup>63</sup>

#### 3.1 Credit Score Match

In order for the participant sample to be a nationally representative sample of FICO scores, participants should ideally have been recruited based on FICO score. However, securing FICO scores for all 200,100 potential participants would have required considerable time and cost. As a recruiting mechanism, we substituted the VantageScore for the FICO score, as VantageScores are more readily provided by the CRAs (for this study, free of charge) and are expected to be an accurate proxy for the FICO score distribution. To evaluate similarities, we present the correlation matrix for FICO scores and VantageScores for the 1,001 study participants at each of the three bureaus in Table 3.1.

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<sup>62</sup> If the consumers who choose to participate in the study (and their experiences) are statistically significantly different from consumers who choose not to participate, the results may not be truly representative of the population of interest. No previous work on credit reporting accuracy has accounted for potential non-response bias.

<sup>63</sup> A non-respondent is defined as a consumer who received the mail invitation but did not choose to participate. Thus, the 3,045 individuals whose invitation was returned as "undeliverable" are not included in the set of non-respondents.



**Table 3.1 Correlations across FICO Scores and VantageScore**

	<b>Score A</b>	<b>Score B</b>	<b>Score C</b>	<b>VantageScore</b>
<b>Score A</b>	1			
<b>Score B</b>	0.92	1		
<b>Score C</b>	0.92	0.95	1	
<b>VantageScore</b>	0.87	0.85	0.85	1

Table 3.1 indicates that the correlation between VantageScores and FICO Scores is positive and high, between 0.85 and 0.87. As expected, however, the correlation is not perfect.<sup>64</sup> FICO Scores and VantageScores differ in part because the exact components and the weighting of those components of credit score models are different.<sup>65</sup> Additionally, FICO scores across CRAs are not perfectly correlated. This is likely a result of the fact that the three national CRAs collect information independently and therefore the information used to compute credit scores may differ across CRAs. In addition, each CRA utilizes a different FICO scoring model.<sup>66</sup>

Table 3.2 compares the distribution of FICO Scores for study participants to the five quintiles of the national FICO Score distribution. In a perfect sample, the quintiles would be represented equally. That is, each FICO score quintile would contain 20% of participants.

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<sup>64</sup> It is also important to note that while an individual’s FICO scores were all drawn at roughly the same time, the VantageScore was determined several months prior to the drawing of the credit reports. Thus, the individual’s circumstances that generated the VantageScore may have changed by the time the FICO scores were generated.

<sup>65</sup> More specifically, FICO states that scores are currently determined by the following weighted criteria: payment history (35%), length of credit history (15%), amounts owed (30%), new credit (10%), and types of credit used (10%). See <http://www.myfico.com/crediteducation/whatsinyourscore.aspx>. Alternatively, VantageScore utilizes different weights and variables: past payment history (28%), depth of credit (9%), balances (9%), recent credit (30%), utilization (23%), and available credit (1%). See <http://vantagescore.com/consumers/learningcenter/didyouknow/#do-you-know-that-article18>. VantageScore notes that the weighting distribution may vary across consumers.

<sup>66</sup> In contrast, VantageScores are formulated so that whenever CRAs have the same information, the corresponding VantageScores are the same.

**Table 3.2 Study Participants in the Five Quintiles of the National FICO Score Distribution**

<b>FICO Score Quintile</b>	<b>589 and below</b>	<b>590-679</b>	<b>680-749</b>	<b>750-789</b>	<b>790 and above</b>
<b>Goal</b>	20.0%	20.0%	20.0%	20.0%	20.0%
<b>Actual Participation</b>	18.2%	20.2%	21%	19.5%	21.2%
<b>VantageScore Range</b>	501-763	501-948	513-990	713-990	740-990
<b>Mean VantageScore</b>	592	675	772	862	904

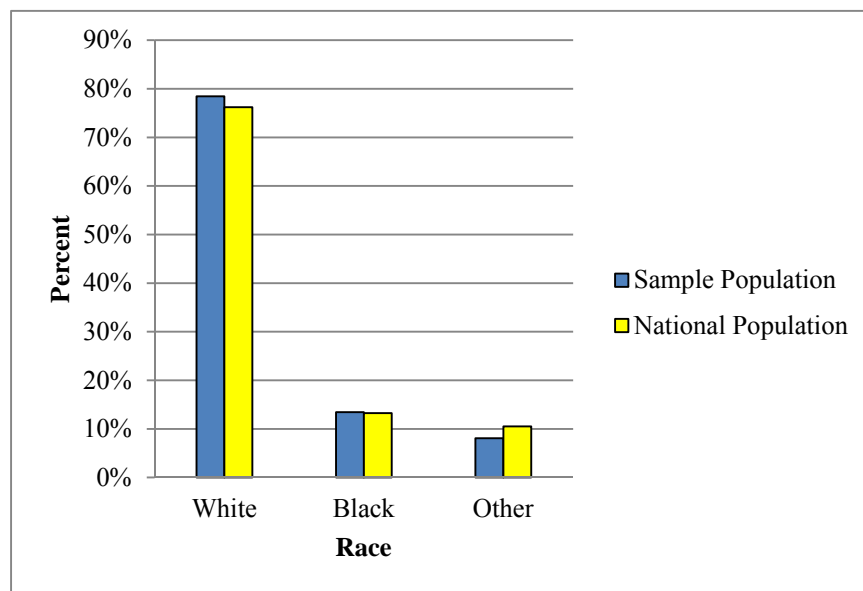
As shown in Table 3.2, each FICO score quintile is well represented. Nonetheless, participants in the lowest quintile are slightly under-sampled and individuals in the middle and highest quintile are slightly over-sampled. The final two rows of Table 3.2 highlight further the fact that, although positively correlated, VantageScores and FICO Scores are computed using different weights of credit history information. Consumers exist with average FICO Scores below 589 who have a VantageScore between 501 and 763.

### ***3.2 Demographic Match***

Secondary to credit score, the stratified sampling procedure was designed to match demographic characteristics of the population of interest (consumers with scorable credit histories at the national CRAs). The sampling frame contained very limited demographic information; only age, gender, and zip code were provided.

Although other demographic characteristics are not provided for the large sampling frame of potential participants, we are able to compare information on participant characteristics to their respective distributions in the 2010 U.S. Census. While we are confident that the sample is representative of consumers with credit histories, it is informative to see how the participant sample compares to the U.S. population. Like the U.S. population, men and women are nearly equally represented in our sample (men comprise approximately 51 percent of participants as opposed to 49 percent in the U.S. population). The participant sample also matches the national distribution of races well; Figure 3.1 presents the distribution of the sample and the U.S. population, illustrating that the sample is representative of black participants, over-represents whites, and slightly under-represents other races.<sup>67</sup>

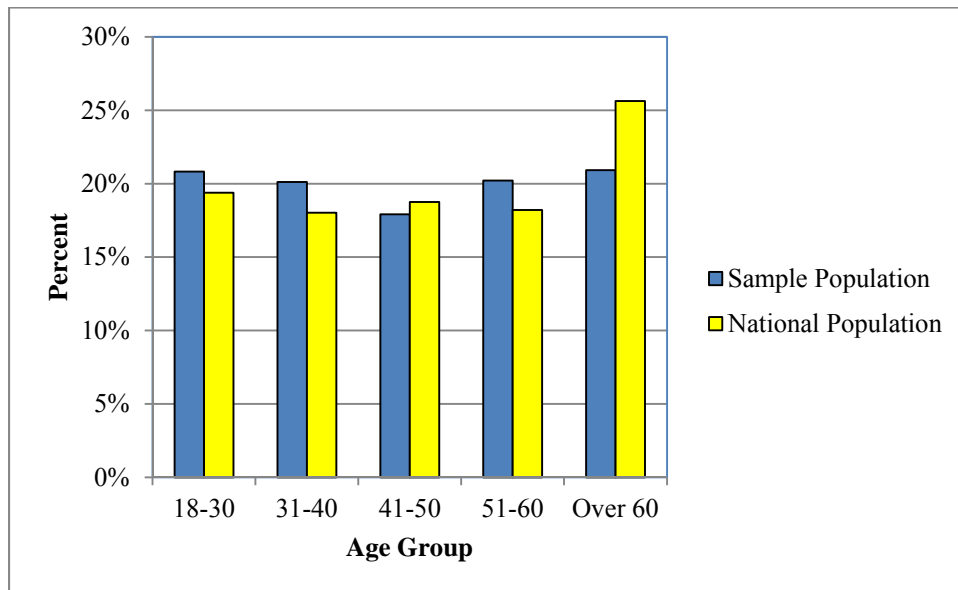
**Figure 3.1 Racial Representation of Participants**



<sup>67</sup>The survey’s initial racial identification question did not conform to OMB’s Standards for the Classification of Federal Data on Race and Ethnicity. Specifically, individuals were required to identify with only one of the following categories: White, Black/African American, Asian, Hispanic/Latino, or Other. Because Hispanic/Latino individuals may have chosen to identify themselves by race only (e.g., identify as “White” without the option to choose both “White” and “Hispanic”), we do not report any analyses related to Hispanic/Non-Hispanic participants. There were 41 participants who chose Hispanic, thus providing no information on race. To collect information on race, these individuals were contacted again and asked to identify race from the categories: White, Black/African American, Asian, or Other. Because 10 individuals who had originally categorized themselves as “Hispanic/Latino” could not be re-contacted to identify their race, we exclude these individuals from any race-related analyses. Lastly, we categorize anyone who identified him/herself as anything other than “White” or “Black/African-American” as “Other” due to the small number of individuals who self-selected as “Asian” or “Other.”

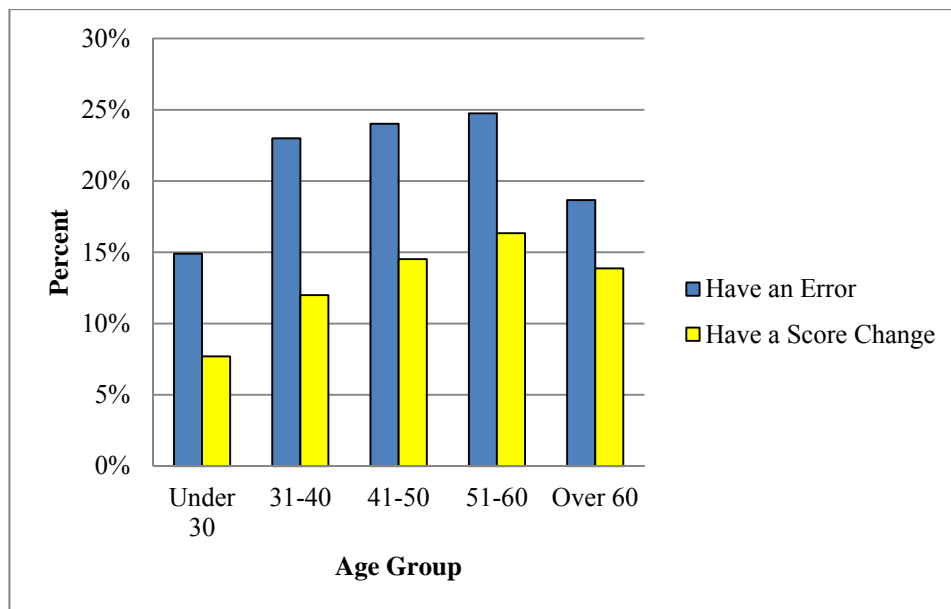
Figure 3.2 compares the age distribution of our participant sample to the national age distribution. The participant sample slightly over-represents the youngest two age categories – individuals between 18 and 40 – at the expense of the oldest age category – individuals over 60. Although the skewing of the participant sample toward younger participants may bias results if younger people and older people differ in how likely they are to have errors on their credit reports, it is unclear in which direction the bias would skew the results. For example, one might expect that individuals who are older are likely to have more items on their credit report and therefore more potential errors. This would lead the FTC study to understate the number of errors on credit reports because older individuals are under-represented in the participant sample.

**Figure 3.2 Age Representation of Participants**



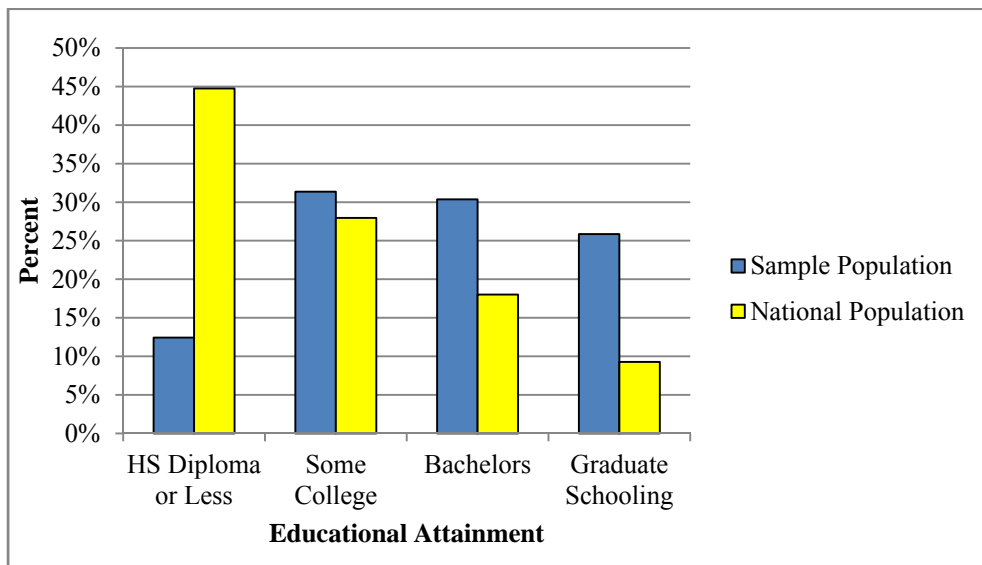
As a preview to the results of this study, Figure 3.3 shows the percent of participants in each age category that have confirmed errors and confirmed errors with score changes. In general, the probability of having an error increases with age category, with the exception of the “Over 60” age group. The “Over 60” age group is less likely to have errors on their credit reports than individuals aged 41-60, but still more likely to have errors than participants under 30 years old. Because older individuals tend to be more likely to have confirmed errors than those under 30, these results suggest that oversampling ages 18-30 at the expense of age 60+ may negatively bias our estimates of the percent of individuals with confirmed material errors and confirmed material errors with score changes. That is, due to the age distribution of the participant sample it is possible that we underestimate the number of people with confirmed material errors.

**Figure 3.3 Percent of Participants in Age Group that Have Confirmed Errors and Score Changes**



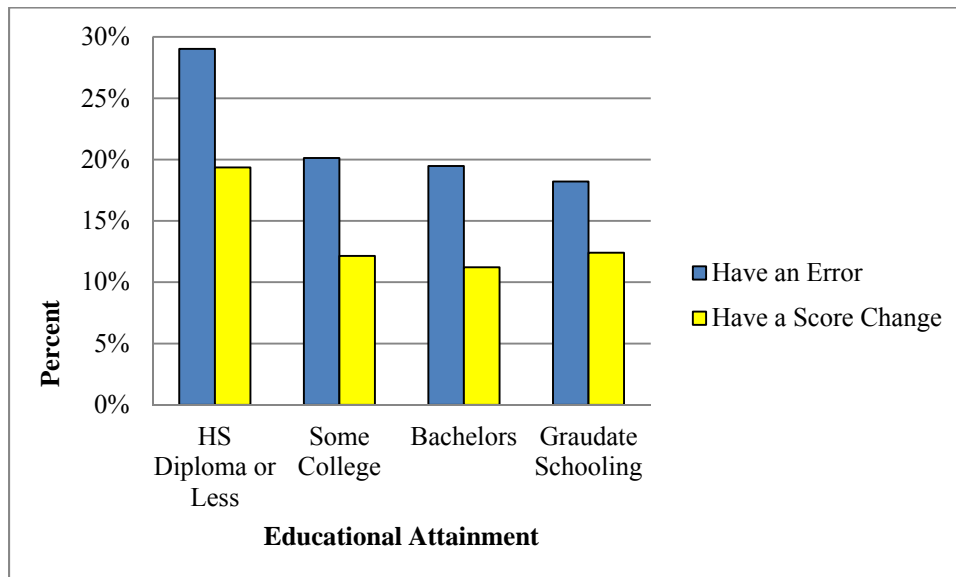
Finally, Figure 3.4 compares the educational attainment level of the sample participants to the educational attainment of the U.S. population. The participant sample does not match the 2010 Census well on educational attainment. Specifically, relative to the Census, the participant sample vastly underrepresents individuals with less education and over-represents individuals with college or graduate schooling. Because educational attainment was not one of the demographic characteristics used in the stratified sampling of study participants, it is not surprising that the distribution of educational attainment for the participant sample does not match the national educational attainment distribution. It is also important to recall that the U.S. population is not the population of interest and it may be the case that the participant sample is in fact representative of the educational attainment for those consumers with credit histories. However, because educational attainment was not included in the sampling frame, we cannot test this empirically.

**Figure 3.4 Educational Attainment Representation of Participants**



The potential implications of a relatively highly educated participant sample are unclear. While there is no clear theoretical link between education and the use of credit (and potential errors), there is an established link between educational attainment and income and it is likely that income and access to credit are potentially positively correlated (i.e., individuals with higher income, on average, may be more likely to be able to receive credit). For example, one might postulate that high income individuals do not require credit as often as those with lower incomes, and thus are less aware of negative information on their credit reports and more likely to have potential errors. Alternatively, one might postulate that because people with lower incomes have fewer liquid assets, they require more credit, have more items on their credit report, and therefore have more potential to identify credit reporting errors. Figure 3.5 below suggests that study participants with a high school diploma or less are more likely to have confirmed material errors than their more educated counterparts. Thus, underrepresenting this group (HS Diploma or less) in the sample may lead to underestimating the rate of confirmed errors.

**Figure 3.5 Percent of Participants in Educational Attainment Category with Confirmed Errors and Score Changes**



As discussed above, while the potential implications of these demographic discrepancies between our sample composition and the national composition are not clear for a study of credit report accuracy, the relationships between participants' demographic characteristics and credit report errors suggest that, all else equal, over-representing younger and more educated individuals may cause credit report error rates to be underestimated. The next subsection takes a more direct approach to identifying potentially important differences between participants and non-respondents by comparing financial-related measures that are likely to materially influence credit scores across the two groups.

### ***3.3 Credit Line Items***

In this subsection we compare several credit line items for study participants to the same items for non-respondents. The stratified sampling technique used to identify study participants over-sampled consumers with relatively low credit scores (and consequently, under-sampled people with relatively high credit scores). Thus, unlike the participant sample, the non-respondent sample is not nationally representative of credit scores. In order to make the participant and non-respondent samples comparable, the non-respondent sample is reweighted. For example, because the sampling procedure solicited more potential participants at the low end of the VantageScore distribution than are representative of the general population, each variable of interest (e.g., number of credit cards) for a low credit score non-respondent receives a weight less than one when the mean number of credit cards for the non-respondents is computed. In contrast, each variable for individuals in the non-respondent sample with high credit scores receives a weight greater than one. Table 3.3 clarifies exactly how the weighting of the non-respondent sample was performed.



**Table 3.3 Sample Weighting for Comparison**

<b>VantageScore</b>	<b>Participants</b>	<b>Non-respondents</b>	<b>Weight</b>
<b>500-519</b>	29	895	0.794
<b>520-539</b>	26	935	0.681
<b>540-569</b>	31	1,050	0.723
<b>560-579</b>	38	1,095	0.850
<b>580-599</b>	36	1,185	0.744
<b>600-619</b>	35	1,255	0.683
<b>620-639</b>	36	1,092	0.808
<b>640-659</b>	43	1,055	0.999
<b>660-679</b>	38	1,202	0.775
<b>680-699</b>	47	1,315	0.876
<b>700-719</b>	47	1,118	1.030
<b>720-739</b>	41	1,079	0.931
<b>740-759</b>	44	1,043	1.033
<b>760-779</b>	38	760	1.225
<b>780-799</b>	37	1,083	0.837
<b>800-819</b>	41	1,065	0.943
<b>820-839</b>	51	1,180	1.059
<b>840-859</b>	56	1,198	1.145
<b>860-879</b>	65	1,186	1.342
<b>880-899</b>	59	1,359	1.064
<b>900-919</b>	54	888	1.490
<b>920-939</b>	35	557	1.540
<b>940-959</b>	23	412	1.368
<b>960-979</b>	18	205	2.151
<b>980-999</b>	32	290	2.704
<b>Total</b>	1,000 <sup>68</sup>	24,502 <sup>69</sup>	

The first column of Table 3.3 presents the VantageScore bins used in the stratified sampling procedure, the second column gives the number of participants in each bin, and the third column lists the number of non-respondents in each VantageScore bin. Finally, the fourth column gives the sample weights used to calculate credit score component means for non-participants for each of the 25 VantageScore bins.<sup>70</sup>

<sup>68</sup> One study participant was dropped because no demographic information was collected for this individual, and two participants were determined to have provided unreliable data.

<sup>69</sup> Although roughly 28,500 letters were mailed to potential participants and 1,003 consumers chose to participate, slightly over 3,000 solicitation letters were returned as “undeliverable” and thus are excluded from the group of non-respondents.

<sup>70</sup>To demonstrate how the weights are determined so that the participant and non-respondent samples match by VantageScore, take the weight in the fourth column of Table 3.3 and multiply it by the corresponding number of non-respondents in the third column. Multiply the resulting number by the total number of participants at the bottom of the second column, and divide that

Table 3.4 displays the average of several credit score components for the participant sample and the weighted non-respondent sample, as well as the difference between these two means. Standard errors for the differences in means are in parentheses and an asterisk on the difference in means indicates that the difference is statistically significant at the 5% level.

Table 3.4 indicates that although participants are statistically indistinguishable from non-respondents for many factors that might be expected to affect credit scores, participants have statistically significantly more credit cards, higher installment loan balances, more recently opened tradelines (within a year of when their VantageScore was calculated), more disputed tradelines, and a larger number of public record bankruptcies than non-respondents do. All of these differences are consistent with our sample being slightly younger and significantly more educated than the U.S. average, and these differences may impact the magnitude of the reported and confirmed errors identified in this study. For example, having more accounts and higher account balances provides our participants with a larger number of opportunities to identify credit report errors than would potentially be found by the average person with a credit report. On the other hand, participants have filed complaints much more often than non-respondents. Therefore, participants may begin the study with fewer errors to identify than consumers who chose not to participate. That being said, given that participants are similar to non-respondents in the majority of factors that could potentially impact credit scores, we expect that any potential biases are modest.

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number by the total number of non-respondents at the bottom of the third column. The result will approximately equal the corresponding number of participants in the second column. For example, using the 980-999 VantageScore bin:  $2.704 * 290 * 1,000 / 24,502 \approx 32$ .

**Table 3.4 Credit Relevant Variables: Participants versus Non-Respondents**

<b>Variable</b>	<b>Participants</b>	<b>Weighted Non-respondents</b>	<b>Difference</b>
<b>VantageScore</b>	757.64	757.45	0.187 (11.82)
<b># Credit Cards</b>	7.12	6.6	0.520* (0.258)
<b># Active Credit Cards</b>	1.89	1.81	0.072 (0.086)
<b># Late Payments</b>	3.88	3.73	0.153 (0.334)
<b># Payments More than 30 Days Late</b>	1.41	1.35	0.058 (0.070)
<b># Payments More than 60 Days Late</b>	1.02	0.92	0.098 (0.063)
<b># Payments More than 90 Days Late</b>	1.66	1.70	-0.042 (0.107)
<b># of Tradelines Currently Delinquent</b>	0.79	0.79	0.007 (0.061)
<b>Credit Card Balances</b>	\$7,631	\$7,435	\$196 (1,262)
<b>Installment Loan Balances</b>	\$44,643	\$35,187	\$9,456* (3,495)
<b># of Tradelines Opened Within the Last Year</b>	0.96	0.81	0.157* (0.043)
<b># of Inquiries Within the Last Year</b>	1.69	1.59	0.094 (0.100)
<b># of Accounts in Collections</b>	1.00	1.11	-0.117 (0.091)
<b># of Disputed Tradelines<sup>71</sup></b>	0.15	0.065	0.085* (0.012)
<b># of Months in File</b>	232	233	0.570 (5.51)
<b># of Public Record Bankruptcies</b>	0.11	0.08	0.017* (0.009)
<b>Property Lien Y/N</b>	0.04	0.05	-0.014 (0.011)

<sup>71</sup> The number of disputed tradelines for participants and non-respondents was provided by 2 of the 3 national CRAs. When a consumer files a dispute, a note is placed on that account specifying that some information related to that account is currently being disputed by the consumer. When the dispute is resolved and the CRA concludes its investigation, the dispute note is removed.

### ***3.4 Potential Voluntary Response Bias***

Finally, even if the demographics of our sample matched that of the U.S. population perfectly, some amount of a particular type of selection bias, known as voluntary response bias (“VRB”), may still occur. VRB is an important concern that is not easily remedied short of forcing participation in a study. A specific concern for this study is that participants may be particularly concerned about credit report errors and therefore more likely to participate in the study. To the extent that these concerned individuals may also be more likely to have potential and confirmed errors in their credit reports, the results of this study may overstate claimed and confirmed credit report error rates. Nonetheless, previous studies that also used voluntary participation to construct a sample of participants (e.g., the PERC study) are also subject to VRB and, in view of privacy concerns, there is no feasible remedy for this potential bias. Indeed, a review of a person’s credit report for possible errors in the context of a nationally drawn random sample *requires* that person’s express permission for the review and thus relies on voluntary participation.

## 4 Results

We provide statistical results in the tables and figures below. Table 4.1 provides basic information on the number of people who identified errors that were judged to be potentially material (i.e., impact their credit score). We present measures of credit report accuracy at both the *report* level and the *participant* level. Because each participant drew three credit reports (one from each CRA), the level at which we describe errors is an important distinction. For example, if two people out of ten possible are found to have errors, then we would say the participant level error rate is 20%. However, those ten people have a total of thirty possible credit reports. If the two people each found errors only in one of their three possible reports, then there would be two out of thirty reports with errors and a report level error rate of 6.7%.<sup>72</sup>

There are 1,001 participants who completed an interview with the contractor.<sup>73</sup> Of these participants, 263 identified alleged errors that were potentially material (using the criteria established above) on at least one credit report. From this set of cases with potentially material errors, one participant confirmed that he/she had chosen not to file a dispute, 262 confirmed that they intended to file a dispute, and the contractor received confirmation from 239 participants that disputes were filed. Although the contractor did not receive confirmation from 23 participants, it is still possible that these individuals filed disputes.<sup>74</sup> For this reason, we utilize the full set of 263 participants with potentially material errors when calculating error rates. Thus, the maximum potential error rate for consumers if all identified potentially material errors were confirmed as inaccurate would be  $263/1,001 = 26.3\%$  of participants.

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<sup>72</sup> In contrast, the PERC study discussed in Section 1 and Appendix A describes errors only at the *report* level.

<sup>73</sup> A total of 1,003 interviews were completed, but two participants provided information that was deemed unreliable and thus were dropped from the analysis.

<sup>74</sup> The contractor tried multiple attempts to contact the 23 individuals who did not confirm sending dispute letters to learn whether they had filed a dispute. In fact, when the new credit report(s) were redrawn, 10 of the 23 participants with unknown dispute status had changes made to their credit report(s) regarding the disputed items, suggesting that at least these ten individuals filed the dispute letters.

**Table 4.1 Data Summary**

<b>Category</b>	<b>Number</b>	<b>Percentage</b>
<b>Participants</b>		
Number of <i>participants</i> with reliable data	1,001	--
<i>Participants</i> who identified potentially material errors and had dispute letters prepared by UMSL	263*	26.3%
<i>Participants</i> with potentially material disputes who confirmed mailing dispute letters	239	23.9%
<i>Participants</i> with changes made to at least one credit report when report is redrawn after dispute letter mailed	206	20.6%
<i>Participants</i> who had at least one credit score change in response to a dispute	129	12.9%
<b>Reports</b>		
Number of credit <i>reports</i> reviewed with study associate	2,968**	--
Total number of <i>dispute letters</i> sent to CRAs (for both potentially material and non-material errors)	708	23.9%
Total number of <i>dispute letters</i> mailed for potentially material errors	572	19.3%
<i>Reports</i> with changes made when report is redrawn after dispute letter mailed	399	13.4%
<i>Reports</i> with credit score change in response to dispute	211	7.1%
Percent of credit <i>reports</i> with no identified potentially material errors	--	81%
Percent of credit <i>reports</i> with no identified potentially material errors and no credit score change	--	87%

Notes: \*One person had dispute letters prepared but the individual decided not to dispute. Therefore, the maximum number of cases with disputes filed is 262.

\*\*If every participant had initially drawn and reviewed three credit reports, the total number of reports reviewed would be 3,003. However, there were 31 participants where the study associate/consumer was unable to draw all three initial reports. Most of these were due to technical issues with one CRA because at the time of the study the CRA had discontinued its standard service with FICO.

We recognize that not every alleged error is in fact an error. After receiving a dispute letter from the consumer, the CRA investigates the alleged error. If the disputed information is confirmed as accurate by the data furnisher, then no changes are made to the credit report. If the disputed information is not confirmed by the data furnisher as accurate, the CRA alters the credit report.

There are a number of ways in which the CRA may change an item on a credit report. The change to an item may be exactly as indicated by the consumer in their dispute letter (e.g., “remove account” results in the account being removed). Alternatively, the CRA may change the item in a way that addresses the consumer’s dispute but is different from how the consumer indicated the account should be changed (e.g., a consumer asks for a balance on a credit card to be changed to zero and the CRA simply removes the account entirely). These various scenarios represent different methods for classifying a disputed item as a “confirmed error.”<sup>75</sup>

Next, we define the method used to classify both reports and participants as having confirmed errors.

#### **4.1 Credit Report Level Changes**

At the credit report level, we define the following scenarios:

- **All Change** reports are those where all the disputed items are changed by the CRA. The reports that are modified by the CRA contain changes that may be broken down into *Full* and *Mixed* changes.
  - *All-Full (AF)* reports are those where all of the disputed items on the report were changed exactly as instructed by the consumer.
    - *Example:* A consumer disputes two collections items as not belonging to him/her and requests that the items be removed. The CRA removes both collections items.
  - *All-Mixed (AM)* reports are those where all disputed items on a report were changed to address the consumer dispute, but at least one change was made in a way that differed from the exact instructions of the consumer.
    - *Example:* A consumer disputes (a) one credit card balance should be \$0 instead of \$200, and (b) two collections items do not belong to him/her and should be removed. The CRA removes the two collections items *and* the credit card from the report (rather than setting the credit card balance to \$0 as instructed).<sup>76</sup>
- **Some Change** reports are those where only some of the items disputed by the consumer are modified. Note the mutual characteristic of reports that are classified as **Some Change** is that there is at least one item disputed by the consumer that was not modified

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<sup>75</sup> Although we use the language “confirmed error” in this report, we only observe whether an item was modified in response to a consumer dispute. In some cases, data furnishers may automatically change the data in accordance with the dispute or are unable to confirm the original data and must modify the information. We infer that a modification in response to a consumer dispute is evidence that the consumer’s dispute is valid and refer to these cases as containing confirmed errors.

<sup>76</sup> In the case where an item was removed from a credit report rather than altered as instructed, it is possible that the credit score may decrease if the credit history or utilization rate changed significantly. Participants were advised that disputing information could lead to both increases and decreases in credit score.

in any way (i.e., the item remains on the report in original form). The reports that are modified contain changes that may be broken down into *Full* and *Mixed* changes.

- *Some-Full (SF)* reports are those where only some items on the report were changed, but all of the changes exactly followed the consumer's instructions.
  - *Example:* A consumer disputes two collections items as not belonging to him/her and requests that the items be removed. The CRA removes one collections item and does not alter the second.
- *Some-Mixed (SM)* change reports are those where only some of the disputed items on a report were changed to address the dispute and at least one change was made in a way that differed from exactly how the consumer requested the change be made.
  - *Example:* A consumer disputes (a) one credit card balance should be \$0 instead of \$200, and (b) two collections items do not belong to him/her and should be removed. The CRA removes one collection item and the credit card from the report (rather than setting the credit card balance to \$0 as instructed). The second collection item stays on the report as originally listed.
- **No Change** reports are those reports where none of the items disputed by the consumer are modified by the CRA.

**Finding 1:** Of the 2,968 reports collected and reviewed during the study, 572 (19.3%) contained potentially material errors. Thus, 80.7% of reports reviewed by the participant and study associate did not contain any potentially material errors.

Through the dispute confirmation process, we infer that reports with modifications had at least one confirmed material error. We find that 399 (69.8%) of the 572 disputed reports contained at least one material error (i.e., were modified by the CRA in response to the dispute).<sup>77</sup> Thus, there are 173 reports where the CRA did not make any modifications to the report in response to the consumer dispute.<sup>78</sup> These un-modified reports imply that there was no actual material error in 30.2% of reports that were disputed despite the consumer's belief that there was a potentially

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<sup>77</sup> One individual declined to participate in the dispute process despite having a potentially material error. Because we cannot determine what changes, if any, would have been made to this report, we exclude this observation from our count of dispute letters filed with the CRAs. Including this individual in any way would have a trivial impact on the results.

<sup>78</sup> Recall that there are 23 participants who did not confirm that they mailed dispute letters to the CRA. It is possible that some of the redrawn reports with no changes may be due to the consumer not filing a dispute. Because we cannot identify whether a dispute was filed for the potential errors of these consumers, we classify these **No Change** reports as validation of the information as originally stated on the report. If these participants were instead dropped from all analysis, the percentage of reports and consumers with material errors would increase.



material error on that report.

**Finding 2:** Out of the 2,968 reports reviewed by consumers with a study associate, consumers identified an error that was modified by the CRA in 399 reports, suggesting that 13.4% of consumer credit reports in the sample contained at least one material error.

In Table 4.2 below, we present the counts and frequencies of reports using the categorizations defined above. We calculate the percentage of reports with potentially material errors that would fall into each of these categories. Conditional on identifying a potentially material error, the reports are categorized in the following way: 31.1% of reports with potentially material errors are *All-Full (AF)*, 8.9% are *All-Mixed (AM)*, 22.7% are *Some-Full (SF)*, and 7.0% are *Some-Mixed (SM)*.

**Table 4.2 Error Classification of Reports Given Modification Decisions by CRAs**

	(1)	(2)	(3)	(4)	(5)	(6)
<b>Classification Category</b>	<b>Number of Reports Disputed with Potentially Material Error(s)</b>	<b>Percentage of Reports Disputed with Potentially Material Errors</b>	<b>Percentage of All Reports</b>	<b>Number of Reports that had a Score Change</b>	<b>Percentage of Reports Disputed with Potentially Material Errors that had a Score Change</b>	<b>Percentage of All Reports that had a Score Change</b>
<i>All-Full</i>	178	31.1%	6.0%	98	17.1%	3.3%
<i>All-Mixed</i>	51	8.9%	1.7%	32	5.6%	1.1%
<i>Some-Full</i>	130	22.7%	4.4%	56	9.8%	1.9%
<i>Some-Mixed</i>	40	7.0%	1.3%	25	4.4%	0.8%
<i>No Change</i>	173	30.2%	5.8%	N/A	N/A	N/A
<b>Total</b>	572	100%	19.3%	211	36.9%	7.1%

Note: Due to rounding, columns may not sum to the total listed in the final row. Recall that *All-Full* are reports where every item disputed by the consumer is modified as instructed, *All-Mixed* are reports where every item is modified but not always as instructed, *Some Full* are reports where only a subset of items are modified but the modifications are done as instructed by the consumer, and *Some-Mixed* are reports where only a subset of items are modified and some of the modifications are not as instructed by the consumer.

While it is instructive to examine the percentage of disputed reports that are classified as having a type of confirmed error, the proportion of reports with confirmed errors relative to the

population of interest is more informative. In column 3 of Table 4.2, we present the percentage of all reports that had a potentially material error that was changed in line with our classification schema. For example, we find that 6% of all consumer reports contained a potentially material error that was changed exactly as the consumer requested (*All-Full*) and 1.7% of consumer reports contained potentially material errors that were changed to address the error, though not all items were changed exactly how the consumer requested (*All-Mixed*). A total of 5.7% of all credit reports had some modifications by the CRA but at least one disputed item remained on the report as originally specified (*Some-Full* and *Some-Mixed*).

Because the scoring process is complex and considers individual items relative to the entirety of an individual's credit report, a disputed report may meet the materiality standards (i.e., it is related to a subject that FICO considers when calculating a score) but the modification of the report might not result in a score change. Thus, we calculate both the percentage of reports that had a score change given a potentially material error and the percentage of all reports that had a score change. Columns 5 and 6 of Table 4.2, respectively, report these findings.

**Finding 3:** Of all reports reviewed by consumers with the study associate (2,968), 7.1% had modifications that resulted in a change in credit score. Of the 572 disputed reports, 36.9% (211 reports) had modifications that resulted in a score change.

## 4.2 Participant Level Changes

We define a participant as having a confirmed material error if the individual has at least one potentially material item that was modified through the dispute process. Over 80% of 262 participants who identified potentially material items had at least one of the disputed items altered. A high frequency of disputes resulting in changes to the consumer's credit report may be unsurprising; the dispute process is designed so that if there is no response from the data furnisher the CRA must alter the record in line with the consumer request. That is, when a consumer identifies and disputes an item as inaccurate, the FCRA process requires that the CRA confirm the veracity of reported information with the data furnisher within 30 days. If the accuracy of the data is not confirmed, the CRA must follow the instructions of the consumer or (perhaps) delete the information. Considering the entire sample, we find that 20.6% of participants had at least one confirmed error that was modified through the FCRA dispute process.

In order to classify confirmed errors at the participant level in more detail, we consider the possible changes that were made to all credit reports where the consumer filed disputes. Thus, the error classification scheme at the participant level is based on the report level classification. At the participant level, we define the following scenarios:

- **Totally Settled (TS)** cases are consumers for whom all credit reports that contained disputed information are classified as either *All-Full* or *All-Mixed*. That is, on all credit reports that contained disputed information, all the disputed information is changed in a way to address the consumer's dispute, though possibly not exactly as instructed by the consumer.

- *Example:* A consumer files disputes at Bureaus A and B. At Bureau A, the report is classified as *All-Full* (i.e., all items are changed exactly as the consumer instructed). At Bureau B, the report is classified as *All-Mixed* (i.e., all of the disputed items are altered to address the consumer's dispute, but the consumer's instructions are not exactly followed).
- **Partially Settled (PS)** cases are consumers for whom at least one credit report that contained disputed information is classified as *Some-Full*, *Some-Mixed* or *No Change*. Although some of the total items disputed by the consumer are settled to address the dispute, other items remain in dispute. That is, after the dispute process, there exists at least one credit report where there is information disputed by the consumer that remains on the report as originally specified.
- **Uniformly Denied** cases are consumers for whom each CRA where a dispute was filed does not modify the report in response to the dispute.

Using our participant-level classification schema defined above, we consider whether a participant's credit reports were changed to address all of a consumer's concerns, some of a consumer's concerns, or if the CRA and data furnishers confirmed the accuracy of all the data disputed by the consumer. Table 4.3 displays that 37.0% and 41.6% of all consumers who disputed potentially material errors are classified as **Totally Settled** and **Partially Settled**, respectively. Moreover, 21.4% of consumers with disputes are classified as **Uniformly Denied**, suggesting that all disputed items for that consumer were verified as accurate credit information by the CRAs. While these conditional statistics are informative to understand the likelihood of a potentially material dispute resulting in a change to a consumer's credit reports, it is important to remember that these statistics are less extreme when considering the entire population. Only 9.7% of all cases in the full sample are classified as **Totally Settled** (i.e., have *all* disputed items modified to address the disputes of the consumer) and 10.9% of consumers in the sample are classified as **Partially Settled**.

**Table 4.3 Error Classification of Consumers Given Modification Decisions by CRAs**

	(1)	(2)	(3)	(4)	(5)	(6)
<b>Classification Category</b>	<b>Number of Participants</b>	<b>Percentage of Participants with Potentially Material Errors</b>	<b>Percentage of All Participants</b>	<b>Number of Participants with a Score Change</b>	<b>Percentage of Participants with Potentially Material Errors who have a Score Change</b>	<b>Percentage of All Participants who have a Score Change</b>
<b>Totally Settled</b>	97	37.0%	9.7%	56	21.4%	5.6%
<b>Partially Settled</b>	109	41.6%	10.9%	73	27.9%	7.3%
<b>Uniformly Denied</b>	56	21.4%	5.6%	N/A	N/A	N/A
<b>Total</b>	262	100%	26.2%	129	49.2%	12.9%

Note: Due to rounding, columns may not sum to the total listed in the final row. Recall that **Totally Settled** are consumers for whom every disputed item on all reports is modified as instructed, **Partially Settled** are consumers for whom there is at least one modification to a disputed item but there is also at least one item that remains unchanged, and **Uniformly Denied** are consumers for whom every disputed item remains unchanged.

As discussed in the report-level analysis, considering whether an error results in a change to a consumer’s FICO score is arguably more important than simply whether an error exists. Thus, we repeat our previous analysis and consider only cases with material errors and score changes (see columns 4, 5, and 6 of Table 4.3).<sup>79</sup>

***Finding 4:*** Of the 262 consumers that filed a dispute, 206 consumers experienced some modification to their credit report in response to the dispute (**Totally Settled** + **Partially Settled**). A total of 12.9% of consumers that participated in the study had a credit reporting error that resulted in a score change.

<sup>79</sup> The rate of score changes does vary across classification; we find that 58% of the cases that are classified as **Totally Settled** and 67% of cases classified as **Partially Settled** resulted in a score change.

### 4.3 Changes in Credit Score

Of the 399 reports that were modified in response to the consumer filing a dispute with a CRA, there are 211 reports where the FICO credit scores for that report changed. Recall that the study’s scoring process uses a frozen file to isolate the change in score for a report due only to changes made in response to the consumer dispute (i.e., no new information is contained in the credit report other than the modifications made by the CRA in response to the dispute). Table 4.4 below presents the impact on credit report scores resulting from the consumer disputes. The majority of disputes (63%) do not result in a credit score change.

**Table 4.4 Report Level Score Changes**

		(1)	(2)	(3)
Change	Reports	Percent of All Reports	Percent of Disputed Reports	Percent of Modified Reports
<b>25+ point decrease</b>	0	0.0%	0.0%	0.0%
<b>20-24 point decrease</b>	0	0.0%	0.0%	0.0%
<b>10-19 point decrease</b>	2	0.1%	0.3%	0.5%
<b>1-9 point decrease</b>	14	0.5%	2.4%	3.5%
<b>None</b>	361	12.2%	63.1%	N/A
<b>1-9 point increase</b>	66	2.2%	11.5%	16.5%
<b>10-19 point increase</b>	55	1.9%	9.6%	13.8%
<b>20-24 point increase</b>	12	0.4%	2.1%	3.0%
<b>25-49 point increase</b>	30	1.0%	5.2%	7.5%
<b>50-99 point increase</b>	28	0.9%	4.9%	7.0%
<b>100+ point increase</b>	4	0.1%	0.7%	1.0%

Note: In addition to the 2,968 reports reviewed with the study associate (all reports), this table includes percentages calculated for the 572 reports with potentially material errors disputed, and percentages calculated for the 399 reports with modifications following the dispute process that were inferred to have at least one material error.

There is no established rule or threshold for classifying the significance of a credit score change as minor or major because the impact of a change in score is dependent on the current score. That is, a 25 point change in FICO score that keeps the consumer in a particular credit risk category may not have a large impact on the person’s likelihood of receiving credit. On the other hand, a one-point change in credit score that moves a consumer from one risk tier to the next may have a large impact on the consumer’s access to credit or the products and rates the consumer is able to secure. Column 2 of Table 4.4 above shows 2.7% of the 572 disputed reports result in a decrease in credit score.<sup>80</sup> Table 4.4 also shows that 63.1% of disputed reports

<sup>80</sup> The study associates advised consumers that filing a dispute could result in either an increase or decrease in the credit score. In cases where the only information in dispute would potentially lower the score (such as decreasing the credit history length, increasing credit utilization, or decreasing the diversity of credit mix), the study associate referred the participant to the FICO help desk to inquire about the implications of filing a dispute. In the PERC study without a study associate to help identify errors and file dispute letters, 1.26% of all reports have

experienced no change to the credit score.

**Finding 5:** Of all reports that were reviewed by a consumer and study associate, 6.6% experienced a positive change in their credit score, and a third of these were between 1 and 9 points.

We also present the change in credit score at the consumer level. A consumer who reviewed three credit reports may have found no errors and thus may have had no disputes. Alternatively, a consumer may have disputed with one, two, or all three CRAs. For example, a consumer who disputed with two CRAs may have one credit report that has a score change of 5 points and another credit report with a score change of 12 points. For this reason, we present Table 4.5 below with data on the percentage of cases that had a maximum score change within a given category. Table 4.5 shows that 3.2% of consumers who reviewed their credit report(s) with a study associate identified a potentially material error and had a maximum score increase (out of possibly three score changes) of 1-9 points and another 3.1% of consumers had a maximum score change of 10-19 points.

**Table 4.5 Consumer Level Score Changes**

Change	Percentage of Participants who had a Maximum Score Change of
<b>25+ point decrease</b>	0.0%
<b>20-24 point decrease</b>	0.0%
<b>10-19 point decrease</b>	0.1%
<b>1-9 point decrease</b>	0.8%
<b>None</b>	N/A
<b>1-9 point increase</b>	3.2%
<b>10-19 point increase</b>	3.1%
<b>20-24 point increase</b>	0.9%
<b>25-49 point increase</b>	2.1%
<b>50-99 point increase</b>	2.3%
<b>100+ point increase</b>	0.4%

Note: There are a total of 1,001 participants in the study. Consumers may have disputed with multiple bureaus and multiple reports may have experienced changes in score (or no changes in score). While this table provides the percentage whose maximum score change is within the given ranges, these consumers may have had smaller score changes, or zero point score changes, on their other disputed reports.

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a decrease in score. The FTC study finds 0.54% of all reports (16 of 2,968 reports) have a decrease in score.

#### **4.4 Analysis by Credit Score Group**

In this section we discuss results of the study by credit score range. One method for reporting statistics is to assign participants to groups based on average FICO score relative to the national FICO score distribution (e.g., the quintiles for the national FICO score distribution are <590, 590-679; 680-749; 750-789; 790+).<sup>81</sup> Alternatively, statistics are sometimes presented relative to credit tiers based on classifications of risk (such as *superprime*, *prime*, *near prime*, *non-prime*, and *subprime*).<sup>82</sup> We follow the strategy of presenting our analysis by FICO credit score tier.

There is no universally accepted (publicly distributed/available) metric for classifying FICO credit scores by their risk level. In fact, each lender may consider different FICO score cut-offs and may consider other factors when making lending decisions. There is some indication, however, that 620, 680, and 720 are historically commonly used thresholds for lenders. Therefore, we use five ranges (<620, 620-679, 680-719, 720-779, and 780+) to classify a consumer's risk level.

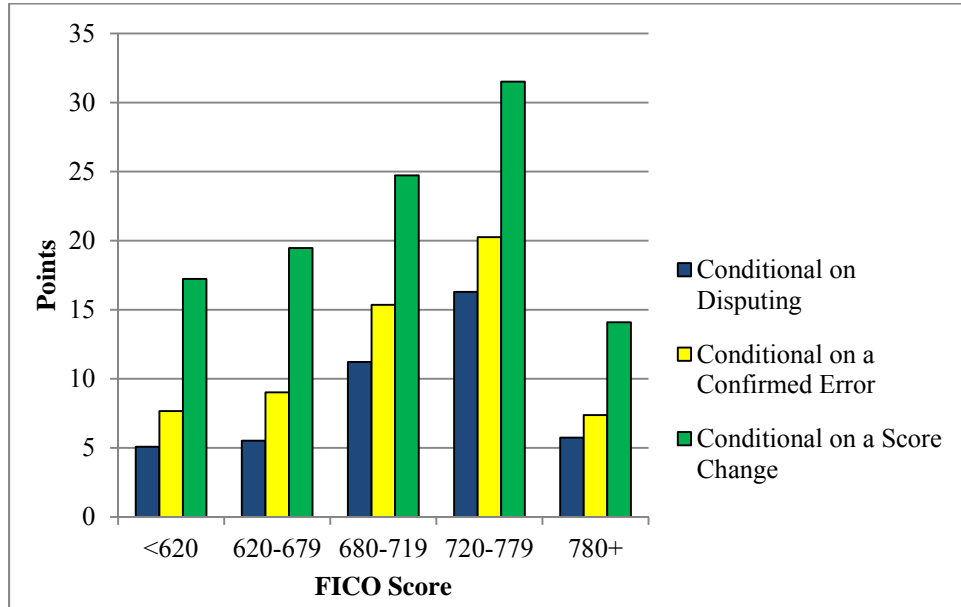
Figure 4.1 presents the change in average score by credit score tier at the credit report level. To determine the average score change, we consider three groups of reports. First we consider all reports where the participant disputed information contained in the report. The blue bars in Figure 4.1 show the average score change for reports with initial scores in the particular score range for the 572 reports that were disputed. The largest score change occurs for reports in the 720-779 initial FICO Score range; on average, disputed reports with this score experienced a change of 15 points. Next we look at the average score change for the 399 reports that were modified in response to a consumer dispute and thus were classified as having a 'confirmed error' by our standards described above. The yellow bars of Figure 4.1 show that the largest average score change of almost 20 points occurs for reports with an initial score of 720-779. Lastly, the average score change for the 211 reports that experienced a score change (eliminating the reports that did not have a score change in response to a consumer dispute) is shown with the green bars. The largest average score change of 32 points occurs for the initial score range of 720-779. Given that the credit score is based on the entirety of a credit file, it is not surprising that correcting an inaccuracy for an above-average score report will have a larger impact on credit score than correcting an inaccuracy on a report with a relatively lower score.

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<sup>81</sup> The contractor report (attached as Appendix D) presents statistics for all participants and for groups of participants where the group assignment is based on the participant's average FICO score in comparison to FICO score quintiles (<590, 590-679, 680-749, 750-789, 790+).

<sup>82</sup> The PERC study uses this strategy, presenting some statistics relative to VantageScore credit tiers.

**Figure 4.1 Average FICO Score Change by Credit Score Group (Report Level)**



Conditional on having a score change, the average score change on a report ranges from 14 points (for reports with initial scores of 780+) to 32 points (for reports with initial scores of 720-779). The change in score due to correcting inaccurate information may affect the consumer’s access to credit, the credit products offered, and/or the terms of credit, particularly if the change in score moves the consumer from one risk category to another for a given lender.

We acknowledge that the thresholds used for classifying consumers to risk categories are somewhat arbitrary. For this reason, we supplement our analysis using thresholds published by FICO at <http://www.myfico.com/HelpCenter/Autos/> to inform consumers on the different auto loan interest rates associated with different ranges of FICO credit scores.<sup>83</sup> These lending thresholds are FICO scores of 590, 620, 660, 690, and 720. In Table 4.6 below, we provide the counts of reports with a score change that causes the report to cross either the FICO auto loan score thresholds or the credit risk threshold we defined above. The threshold definition will have some impact on the number of reports that cross from one tier to another.

<sup>83</sup> Specifically, on May 2, 2012 FICO reported that the interest rate for a five year auto loan might be as low as 3.701% for consumers with credit scores in the range 720-850 and as high as 17.292% for consumers with credit scores in the range 500-589.



**Table 4.6 Credit Tier Transitions: Report Level**

	<b>FICO Auto Loan Tiers (590, 620, 660, 690, 720)</b>		<b>FTC Staff Defined Tiers (620, 680, 720, 780)</b>	
	Reports	Consumers	Reports	Consumers
<b>No Change in Tier</b>	334	157	335	160
<b>Increases 1 Tier</b>	50	39	52	39
<b>Increases 2 Tiers</b>	15	13	11	9
<b>Increases 3 Tiers</b>	0	0	1	1

Note: The number of consumers affected by the change in tier is provided in the second and fourth columns. More specifically, there are 50 reports that have a score change that crosses the FICO Auto Loan Tier threshold and these 50 reports belong to 39 unique consumers.

In general, the majority of reports ( $334/399 = 83.7\%$ ) that are modified do not change credit score tier. There are no reports with a score change such that the report moves to a lower tier. There are over 60 reports where the score change moves the report into a higher credit score tier regardless of which tier definition is used.<sup>84</sup>

**Finding 6:** Given the initial sample of 2,968 reports, the rate of credit tier increase in the sample is approximately 2.2% (65 reports). Of the 1,001 participants, 52 (or 5.2%) experienced a credit tier increase using the FICO Auto Loan thresholds.

#### 4.4.1 Reports with Confirmed Errors by Credit Score

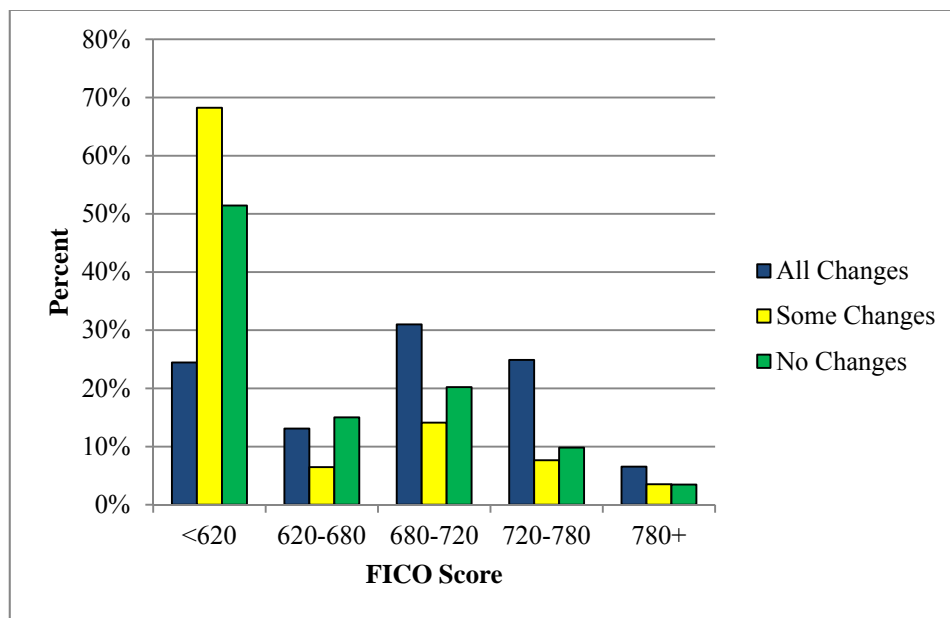
We have defined five classifications for how a disputed credit report may be handled by a CRA in response to a consumer dispute: (1) *All-Full (AF)* where every item disputed by the consumer is modified as instructed; (2) *All-Mixed (AM)* where every item disputed by the consumer is modified but not entirely as instructed by the consumer; (3) *Some-Full (SF)* where only a subset of disputed items are modified but all modifications are as instructed by the consumer; (4) *Some-Mixed (SM)* where only a subset of disputed items are modified and some of the modifications differ from the instructions of the consumer; and (5) *No Change* where no items disputed by the consumer are modified by the dispute process.

In Table 4.2, we presented the percentages of reports that are classified according to this method. It may be the case, however, that the likelihood of being classified as having a confirmed

<sup>84</sup> In a recent report, the Consumer Financial Protection Bureau (“CFPB”) also defined score ranges in order to evaluate meaningful differences between consumer- and creditor-purchased credit scores. (See *Analysis of Differences between Consumer- and Creditor-Purchased Credit Scores*, CFPB, September 2012 available at <http://www.consumerfinance.gov/reports/analysis-of-differences-between-consumer-and-creditor-purchased-credit-scores/>). The ranges used by the CFPB credit score are scores less than 620, between 620 and 680, between 680 and 740, and greater than 740. Because there are only four ranges, there is less opportunity for a score change to cross a threshold. We do find, however, that 42 reports (1.4%) and 37 consumers (3.7%) experienced a credit tier increase using the CFPB credit score report ranges.

material error is dependent on the original credit score. Figure 4.2 below presents the percentage of reports with a given classification that have an initial credit score within the credit score range: <620, 620-679, 680-719, 720-779, and 780+. The blue bars show the percentage of credit reports that are classified as *All* (the sum of *AF* and *AM*) that fall in the particular credit score range; for example, 26% of credit reports classified as having *All* changes made have an initial score <620 and 8% have initial scores of 780+. The yellow bars represent the reports that are classified as having *Some* of the disputed items modified (and some disputed items remain as originally reported); the majority (67%) of these reports have initial credit scores below 620 and the next most common score range for these reports is 680-719. The green bars show the percentage of reports classified as having *No Changes* that fall within the given credit score ranges.

**Figure 4.2 Credit Report Classifications of Confirmed Errors by FICO Credit Score Group**



Note: There are 572 reports with at least one potentially material disputed item.

What is clear from Figure 4.2 is that reports with confirmed errors exist in all credit score ranges.<sup>85</sup> The majority of reports with *Some Changes*, however, tend to have low initial credit scores. This is unsurprising, given that the types of errors identified by study participants tend to be errors that may result in a lower credit score. Therefore, individual reports with low scores are more likely to have errors identified by the participants. There does not appear to be a systematic pattern between type of classification (*All* versus *Some*) and credit score.

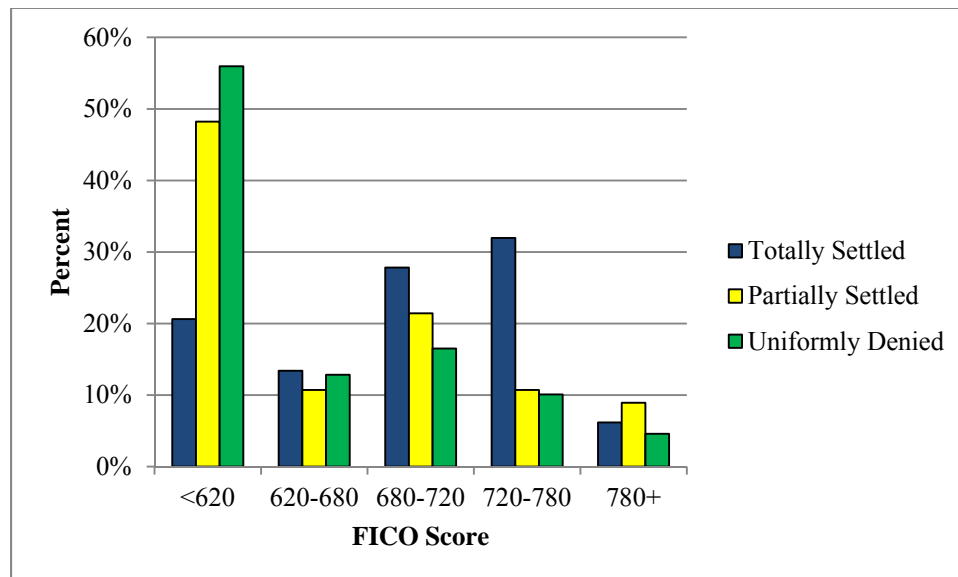
<sup>85</sup> It is also noteworthy that there are disputed reports with no modifications (*No Change* reports) at each credit score level. The majority of these occur for reports with low initial scores (<620).

#### 4.4.2 Consumers with Confirmed Errors by Credit Score

We have defined three classifications of participants who disputed at least one potentially material error in one of their credit reports – those who had all disputed errors modified by the CRAs (**Totally Settled**); those who had some of their disputed information modified by the CRAs but had some disputed items remaining on a report as originally listed (**Partially Settled**); and those who disputed items with CRAs but had no modifications to their report (**Uniformly Denied**).

Figure 4.3 below shows the percentage of participants with a given error type classification whose average FICO credit score falls within the relevant credit score range. More specifically, 20% of cases that are classified as **Totally Settled** have average credit scores in the <620 range and 5% of these cases have an average FICO score in the 780+ range. The majority of cases (46%) where the disputes are **Partially Settled** occur in the <620 range and only 8% have an initial FICO score of 780+. The consumers who are **Uniformly Denied** in their disputes also tend to have lower scores; only 6% have scores above 780 while 55% have scores below 620.

**Figure 4.3 Consumer Level Error Classification by Average FICO Score Group**



#### 4.5 Item Level Changes

In this section we describe the types of information that are alleged to be incorrect on disputed credit reports. We present the main types of alleged and confirmed material errors. In addition, we calculate the frequency of errors that were disputed as not belonging to the consumer and the modification rate of these types of errors. Lastly, we examine the extent to which CRAs modified items as instructed by the consumer and the degree to which CRAs took divergent action on the same disputed item.

#### 4.5.1 Types of Disputes and Confirmed Errors

Using the materiality standards described in Section 2.3, a study associate prepared a dispute letter if the consumer identified incorrect information that was judged potentially material. In some cases, consumers filed disputes where some of the disputed information was not potentially material. For instance, a consumer might dispute a collections account as not belonging to him/her and also request a correction to a previous address/name listed on the report. The previous address is referred to as “header information.” Inaccurate header information does not directly affect credit scores.<sup>86</sup>

We group error types into seven possible categories: header data, tradeline data, credit inquiries, collections data, public records data, duplicate records, and other. As a result of reviewing credit reports with the study associate, the 262 consumers with potentially material errors identified 166 alleged errors in header data, 761 alleged errors in tradeline data, and 515 alleged errors in collections data. Due to technical issues, there were some reports (13) that could not be redrawn after the dispute process, therefore column 1 of Table 4.7 presents the counts of alleged errors where the dispute outcome is known; of the known outcomes, there were 154 alleged errors in header information, 708 alleged errors in tradeline data, and 502 alleged errors in collections data. Although a consumer may identify a potential error, the dispute process verifies (to some degree) whether the alleged error is truly an error. In column 2 of Table 4.7 we present the counts of errors of a particular type that were modified by the CRA in response to a consumer dispute. In column 3 of Table 4.7 we report the percentage of particular types of alleged errors that were modified by the CRA in response to the consumer dispute; 53% of alleged errors in collections data were modified by the CRA when disputed by the consumer and 64% of alleged errors in header information were modified by the CRA.

Because we do not have a count of all the items on an individual’s credit report (and thus no denominator), we are unable to present the confirmed error rate at the item level for the entire sample. However, we calculate the number of reports that contain an alleged error of this type and the number of reports that had the item modified. Column 4 provides the count of credit reports with alleged errors of a given type. For example, consumers identified an alleged error in tradeline data in 409 of the 2,968 (13.7%) credit reports. The final two columns present the number and percentage of all reports that contained a confirmed error of that type. For example, 146 reports contained 502 alleged collections errors of which 223 were modified by the CRA. This implies that 4.9% (146/2,968) of reports have an average of 1.5 (224/146) errors in collections information.

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<sup>86</sup> Participants who identified *only* errors in header information disputed the errors with the relevant CRAs but these reports were not rescored by FICO since the correction would not impact credit score. These ‘header information only’ disputes are also not included in the count of 572 potentially material dispute letters. There were 14 disputes filed by 10 consumers regarding alleged inaccuracies in header information only.

**Table 4.7 Item Level Error Types: Allegation and Modification Rates**

	(1)	(2)	(3)	(4)	(5)	(6)
<b>Error Type</b>	<b>Number of Alleged Errors<sup>87</sup></b>	<b>Number of Items Modified</b>	<b>Percent Changed</b>	<b>Number of Reports with this Alleged Error</b>	<b>Number of Reports with this Error Modified</b>	<b>Percent of All Reports Examined with this Error Modified</b>
<b>Collections</b>	502	267	53.2%	223	146	4.9%
<b>Duplicate Entries</b>	65	30	46.2%	39	27	0.9%
<b>Header Information</b>	154	99	64.3%	127	90	3.0%
<b>Inquiries</b>	88	48	54.5%	48	34	1.1%
<b>Derogatory Public Records<sup>88</sup></b>	44	25	56.8%	35	20	0.7%
<b>Tradeline Information</b>	708	395	55.8%	409	267	9.0%

Note: There are a total of 1,561 items disputed where the outcome is known. There are an additional four items where the disputed error cannot be classified as a collections item, duplicate entry, header information, inquiries, derogatory public record, or tradeline information. None of these four items was modified by the CRA. A credit report might have multiple types of errors disputed and thus the numbers in column 4 do not sum to the number of credit reports disputed.

***Finding 7:*** The most common types of alleged errors are errors in collections (32.2% of disputed items) and tradeline information (51.8% of disputed items). The modification rate is greater than 50% for most types of errors (with the exception of “Duplicate Entries”).

#### **4.5.2 Items Disputed as “Not Mine”**

Within the classifications of error types discussed above, we are able to examine whether the consumer disputed the item as not belonging to him or her. If a consumer disputes specific information as not belonging to him or her, it may be evidence of a mis-merged file (i.e.,

<sup>87</sup> Due to technical difficulties in obtaining some of the rescored credit reports, the dispute outcomes for 90 items could not be verified. We exclude these 90 items from our analyses in Table 4.7.

<sup>88</sup> Derogatory public records are public records related to financial transactions maintained by the federal and/or state government that may adversely affect a consumer’s credit score. Examples include foreclosures, bankruptcies, and judgments/tax liens.

information belonging to another individual is merged onto a consumer's credit report). Table 4.8 presents the break-down of the allegedly incorrect items that are disputed as not belonging to the consumer. For example, the upper panel presents statistics at the item level; 413 of the 502 disputed collections accounts allegedly do not belong to the consumer. Of these, 50.6% are modified in response to the dispute. The lower panel presents statistics at the report level; 190 of the 224 reports with alleged inaccuracies in collections information are disputed as not belonging to the consumer and 61.1% are modified in response to the dispute.

The first and fifth column of the top panel of Table 4.8 reproduce information from Table 4.7; column 1 provides the total number of alleged errors of that particular type and column 5 provides the modification rate for all errors of that particular type. It does not appear that items disputed as not belonging to the consumer are changed at a different rate than items of that type disputed for other reasons. In other words, if a consumer identifies and disputes potential evidence of a mis-merged file, the modification rate is roughly similar to the modification rates when the consumer identifies inaccuracies in accounts that do belong to him/her.

**Table 4.8 "Not Mine" Error Types at the Item and Report Level: Allegation and Modification Rates**

	(1)	(2)	(3)	(4)	(5)
	<b>Number of Alleged Errors</b>	<b>Number of Items with "Not Mine" Alleged</b>	<b>Number of Items with "Not Mine" Corrected</b>	<b>Percent of Items with "Not Mine" Allegation of this Type Modified</b>	<b>Percent of Items with Any Allegation of this Type Modified (from Table 4.7)</b>
<b>Collections</b>	502	413	209	50.6%	53.2%
<b>Inquiries</b>	88	88	48	53.9%	54.5%
<b>Tradeline Information</b>	708	246	133	54.1%	55.8%
	<b>Number of Reports with this Alleged Error</b>	<b>Number of Reports with "Not Mine" Alleged</b>	<b>Number of Reports with "Not Mine" Corrected</b>	<b>Percent of Reports with "Not Mine" Allegation of this Type Modified</b>	<b>Percent of Reports with Any Allegation of this Type Modified</b>
<b>Collections</b>	224	190	116	61.1%	65.3%
<b>Inquiries</b>	48	48	33	68.8%	70.8%
<b>Tradeline Information</b>	409	144	81	56.3%	65.3%

**Finding 8:** Inaccurate items that were disputed as “not mine” are modified at similar rates (over 50%) as errors disputed for other reasons.

### 4.5.3 Consumer Requests and CRA Action

When disputing alleged errors, a consumer requests that the CRA take some kind of action. In the simplest terms, a consumer requests that an item either be removed entirely or altered in some way. In response, the CRA may remove the item, alter the item as requested, alter the item in a manner different than requested, or make no change to the disputed item.<sup>89</sup> Table 4.9 shows the rates at which consumer requests were followed by the CRAs. When consumers requested that an item be removed, the CRAs removed the item in question for 52.2% of the requests and made no change for 46.3% of the removal requests. When consumers requested an item be altered in a specific manner other than being removed, the item in question was altered as requested by the consumer 27.5% of the time and no change was made for 42.1% of the alteration requests.

**Table 4.9 Actions Requested and Taken at the Item Level**

Type of Modification Requested	Altered as Requested	Altered Differently than Requested	No Change
<b>Alter</b>	27.5%	30.4%	42.1%
<b>Remove</b>	52.2%	1.5%	46.3%

Note: There are 1,561 items disputed where the outcome is known.

### 4.5.4 Divergent Action by CRAs on the Same Disputed Item

Consumers generally review three credit reports to identify potential errors. When a consumer disputes with multiple bureaus, it is not necessarily the case that the consumer is disputing the same item across multiple bureaus. It is not uncommon for a potential error to appear on only one report and/or for different errors to appear across different reports for the same consumer. There are, however, a significant number of alleged errors that occur on multiple reports and thus provide an opportunity to examine whether CRAs respond differently to the same disputed error.

Table 4.10 presents the number of items disputed at one, two, or three CRAs. There are 558 items identified by the consumer and disputed at a single CRA, 199 alleged errors in items that occur on two reports, and 177 alleged errors in items that occur on all three credit reports where all outcomes are known.<sup>90</sup> We note the percentage of items where the CRAs agree in how the

<sup>89</sup> If the data furnisher is unable to verify the accuracy of the information as reported, the CRA is required to remove the item. Given the nature of the study design, we are unable to identify whether a removal of an item is due to investigation or an inability of the data furnisher to verify the information.

<sup>90</sup> Recall that there are 90 items for which we do not know the action taken by the CRA because we were not able to draw a second credit report following the dispute process. Table

item is settled (modified) with the consumer, and the percentage of items where the CRAs all disagree with the consumer.

It is also possible that the consumer requested the same action on an item at multiple CRAs, but the response across CRAs was different. For example, the consumer may have requested a tradeline be removed at two CRAs and one CRA removed the tradeline while the other CRA did not change the report. Table 4.10 shows that of the 199 items that consumers disputed at 2 CRAs, the CRAs took divergent action for 22.6% of the items. When consumers disputed the same item at all three CRAs, the CRAs took divergent action for 30.5% of the items.

**Table 4.10 Action Taken on Items Disputed at Multiple CRAs**

	<b>Disputed at only 1 CRA</b>	<b>Disputed at 2 CRAs</b>	<b>Disputed at 3 CRAs</b>
<b>Number of Unique Items</b>	558	199 (398 total)	177 (531 total)
<b>Percentage of Items Settled in Agreement with Consumer</b>	59.9%	44.2%	31.1%
<b>Percentage of Items Divergently Settled</b>	N/A	22.6%	30.5%
<b>Percentage of Items Uniformly Denied</b>	40.1%	33.2%	38.4%

**Finding 9:** CRAs took divergent action (modifying, removing, or leaving the item unmodified) on the same disputed error for 22.6% of the items disputed at two CRAs and 30.5% of the items disputed at three CRAs.

#### **4.6 Changes in Credit Score for All Disputed Reports**

In the previous tables and figures we have only considered the actual changes to scores from modifications made to credit reports following the FCRA dispute process. There are, however, 56 consumers who alleged inaccuracies but the CRA did not modify their reports in any way. In addition, there are 109 consumers who did not have all the disputed items on their report(s) modified in response to the dispute. It is possible that the disputed information that was verified by the data furnisher as correctly reported may, in fact, be inaccurate. The National Consumer Law Center (NCLC 2009) gives several examples of individuals who disputed inaccurate information but received no modifications to their reports due to the mechanized dispute process and the lack of human investigation.<sup>91</sup>

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4.10 excludes all items that were disputed at a CRA where a report was not able to be redrawn (i.e., if an item was disputed at CRA A and CRA C but we were not able to redraw a report from CRA C, the item was excluded from the analysis of Table 4.10).

<sup>91</sup> *Supra* fn 14. Examples include cases of (a) mixed or mis-merged files due to the CRA's use of an algorithm that matches on only 7 digits of a SSN; (b) identity theft; (c) furnisher errors; and (d) re-aging of old debts (when a consumer makes a small payment on a debt that is approaching



To account for the possibility that the un-modified disputed items are in fact true errors on the credit report, we compare the original credit score to the hypothetical score determined by the FICO analyst if *every* allegedly inaccurate item were changed as instructed by the consumer. In Table 4.11 below, we provide the distribution of score changes that would occur if *every* item identified as inaccurate by the participants were truly an error and was modified by the relevant CRA as instructed. If every consumer dispute were true and modified, there would be an increase in the credit score on 11.6% of credit reports as opposed to the total of 6.6% we find in Table 4.4.

**Table 4.11 Report Level Changes in Credit Score if All Disputes were Modified by the CRA as Instructed**

		(1)	(2)
Change	Reports	Percent of All Reports	Percent of Disputed Reports
<b>25-49 point decrease</b>	3	0.1%	0.5%
<b>20-24 point decrease</b>	0	0.0%	0.0%
<b>10-19 point decrease</b>	2	0.1%	0.3%
<b>1-9 point decrease</b>	15	1.5%	2.6%
<b>None</b>	209	N/A	N/A
<b>1-9 point increase</b>	92	3.1%	16.1%
<b>10-19 point increase</b>	80	2.7%	14.0%
<b>20-24 point increase</b>	21	0.7%	3.7%
<b>25-49 point increase</b>	87	2.9%	15.2%
<b>50-99 point increase</b>	49	1.7%	8.6%
<b>100+ point increase</b>	14	0.5%	2.4%

Note: There are 2,968 reports reviewed with the study associate and 572 reports with potentially material errors disputed. This table assumes that all 572 reports with potentially material errors are modified as instructed by the consumer.

**Finding 10:** If *every* allegedly inaccurate item were changed as instructed by the consumer, 11.6% of the sample credit reports would experience a score increase and 2.2% of credit reports would increase score by more than 50 points.

#### **4.7 Discussion of Results in Context of Previous Studies**

Overall, the results of this study are well within the range of statistics implied by the existing literature on the issue of credit reporting accuracy. The previous studies that utilized information from only consumers found extremely high error rates (e.g., U.S. PIRG 2004 reports an error rate of 79%). Alternatively, studies utilizing data from only disputed credit reports found relatively low error rates (e.g., the CDIA estimated in 2003 that 2.5% to 12.5% of credit reports sent to

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or exceeded the statute of limitations, the debt is re-aged and the time to collect the debt is extended).

consumers who were denied credit were modified in response to a consumer dispute). The 2003 GAO report thoroughly discusses the limitations of these previous studies and we briefly describe the issues throughout Section 1.4.

The PERC Study discussed in Section 1.4.4 is similar to the FTC 319 Study in several ways. Most notably, the PERC Study is the only other study to utilize both direct consumer involvement and the FCRA dispute process to measure credit reporting accuracy. The results of the two studies, however, are quite different. The estimated prevalence of credit report errors and their significance to credit score are notably lower in the PERC Study than in the FTC 319 Study. For example, 5.4% of credit reports evaluated in the PERC Study had potentially material information disputed by the consumer (86.2% of these disputed reports resulted in some change to material information by the CRA). In the FTC Study, 19.3% of reports evaluated resulted in disputes of potentially material information (69.9% of which resulted in a modification). Also, 3.1% of credit reports evaluated in the PERC Study increased score through the FCRA dispute process, while in the FTC Study 6.6% of credit reports evaluated had a score increase.

These differences in results suggest that although the FTC and PERC's methodologies differ in ways that appear subtle, the methodological differences meaningfully affect the studies' ability to identify credit report errors. The most notable distinctions in study design are the sampling procedure and the exact mechanism of error identification.

PERC Study participants were drawn from a sampling frame designed to mimic the U.S. Census. In contrast, the FTC Study stratified and sampled in waves to generate a participant pool that is representative of the national credit score distribution. Because PERC did not stratify and sample in waves like the FTC 319 study, its participant pool over-represents individuals with high credit scores (and therefore under-represents individuals with low credit scores).<sup>92</sup> This potential over-representation of consumers with high credit scores likely influences the PERC study's findings, as the existence of credit report errors are typically negatively correlated with credit score.

The studies also differ in how consumers identify errors. In contrast to the use of study associates to aid consumers in their review of credit reports and filing of dispute letters, participants in the PERC Study received written instructions with FAQs on how to evaluate their credit report(s) and file disputes on their own. The PERC Study suggests that using study associates may reduce participation, but response rates for the two studies were similar, 4.1% for PERC and 3.9% for the FTC Study. The PERC Study also suggests that using study associates may bias estimates of credit report errors if individuals with more time to participate in the study are also more likely to have errors in their credit reports. However, neither the existence of such a bias nor its potential direction is obvious. Moreover, the PERC Study is subject to similar immeasurable bias claims (e.g., participants that are willing and able to review reports and file disputes on their own may be less likely to have credit report errors than a randomly selected individual).

We provide a more detailed comparison of the FTC Study results and the PERC Study results in Appendix A.

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<sup>92</sup> The FTC's pilot studies also over-represented individuals with high credit scores, which motivated the stratified sampling procedure used in this study.

## 5 Characteristics of Participants with Errors

As shown in Figure 4.2 in Section 4, participants with errors (verified by the dispute process and modifications to the credit reports) are more likely to have lower average FICO credit scores than those without errors. In this section, we examine whether the likelihood of a participant having a confirmed error is associated with other consumer traits. It is important to note, however, that the FTC 319 Accuracy Study was not designed to specifically address whether a link exists between error rates and consumer characteristics. The sample size is relatively small, particularly when controlling for characteristics of the participant. Thus, the tables below are presented for descriptive purposes only.

Within this section, we define a participant as having a confirmed error if the consumer disputed an item with at least one CRA and at least one report was modified in response to the consumer dispute (i.e., using the classifications defined in Section 4, a consumer has a confirmed error if they are classified as either **Totally Settled** or **Partially Settled**). In addition, we only consider consumers who had a change to their credit score on the modified report.<sup>93</sup>

First we provide basic summary statistics of the participant sample. For example, the first two columns of Table 5.1 presents the demographic characteristics reviewed in Section 3, as well as information on other personal traits. A majority of participants (68%) had previously requested copies of their credit reports and a sizeable number (25%) had previously filed a dispute with a CRA. The participants were generally likely to pay their credit card bills; 49% of participants stated that they pay off their entire bill each month and 85% reported paying more than the minimum balance each month.

The third and fourth columns of Table 5.1 present the number and percentage of participants with changes to their credit score. For example, 27% of the participants who have a confirmed error with a score change have a bachelor's degree and 26% are between the ages of 51 and 60. A comparison of the fourth and second column illustrates that the participants with confirmed errors may not be a random selection of the larger participant sample (e.g., 21% of the sample is younger than 30 but only 13% of participants with confirmed errors are younger than 30). Examining only the raw data would imply that the following groups are more likely to experience confirmed errors: black participants, participants with less than a high school degree, participants over 41 years old, participants who previously requested a credit report, participants who had previously disputed with a CRA, and participants who do not pay more than the minimum balance monthly on their credit cards.

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<sup>93</sup> Recall there are 129 consumers with a modification to a disputed report that resulted in a score change. A total of 211 reports were modified such that the credit score changed.

**Table 5.1 Summary Statistics of Participant Sample**

	(1)	(2)	(3)	(4)
	Number of People	Percent of People <sup>94</sup>	Number of People with Score Change	Percent of People with Score Change
<b>Gender</b>				
Male	513	51%	65	50%
Female	488	49%	64	50%
<b>Race</b>				
White	775	78%	86	67%
Black	133	13%	29	23%
Other	80	8%	13	10%
<b>Education</b>				
High School or Less	124	12%	24	19%
Some College	313	31%	38	30%
Bachelor's Degree	303	30%	34	27%
Graduate School	258	26%	32	25%
<b>Age Groups</b>				
Under 30	208	21%	16	13%
31-40	201	20%	24	19%
41-50	179	18%	26	20%
51-60	202	20%	33	26%
Over 60	209	21%	29	23%
<b>Has above Median Number of Tradelines (5)</b>	480	48%	62	48%
<b>Previously Requested Credit Report</b>	680	68%	98	77%
<b>Previously Received Credit Score</b>	396	40%	45	35%
<b>Previously Disputed with a CRA</b>	197	25%	49	48%
<b>Took a Personal Finance Management Course</b>	228	23%	31	24%
<b>Pays More than the Minimum Balance Monthly</b>	786	85%	90	79%
<b>Pays the Full Balance Monthly</b>	456	49%	41	36%

<sup>94</sup> The denominator for each category is the total number of people who responded to the question. That is, if only 500 of the 1,001 participants responded to a particular question, and of those 500, 100 responded in the affirmative, the percent would be 20% (100/500), not 10% (100/1,001).

It is important, however, to not draw causal conclusions from the raw data presented in Table 5.1. Personal characteristics may be correlated with some other trait that is associated with having a confirmed error with a score change. For example, if the likelihood of having a confirmed error is associated with the number of public bankruptcies and older participants are more likely to have public bankruptcies, then it would appear that older participants are more likely to have errors when the existence of errors is actually related to the specifics of the credit report and not the characteristics of the participant. Similarly, we would expect participants with more total information on the credit report to have a higher potential for errors than a participant with very little credit history information.

To further investigate the participant characteristics associated with confirmed errors we perform multivariate analysis. Specifically, we use logit regression to estimate the statistical association between demographic characteristics and the likelihood of having a confirmed error with a score change. The demographic variables include gender, age, age-squared (to control for non-linear effects of age), a dummy variable for whether the participant is white, and a dummy variable for whether the participant has either a bachelor's degree or graduate degree.<sup>95</sup> The results of two specifications are presented in Table 5.2. Because errors are more likely to occur on reports with low credit scores (see Figure 4.2), all models include controls for the participant's average FICO score and are estimated with robust standard errors.<sup>96</sup>

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<sup>95</sup> Note that the race categories are defined using the question “Would you classify yourself as (a) White; (b) African-American; (c) Asian; or (d) Other” as discussed in Section 3. Due to the small number of participants who classify themselves as “Asian” or “Other,” we group the participants into white and non-white classifications for the multivariate analysis.

<sup>96</sup> Average FICO score is included as a third order polynomial to allow for non-linear effects.

**Table 5.2 Likelihood of Having a Confirmed Error that Results in a Score Change**

	(1)	(2)
	<b>Coefficient Estimate</b>	<b>Coefficient Estimate</b>
	<b>(z-statistic)</b>	<b>With Income Controls (z-statistic)</b>
<b>Male</b>	0.050 (0.25)	-0.067 (-0.32)
<b>Age</b>	0.113*** (3.22)	0.089** (2.51)
<b>Age-Squared</b>	-0.001** (-2.43)	-0.001* (-1.71)
<b>White</b>	-0.418* (-1.92)	-0.536** (-2.36)
<b>Bachelor's Degree or Higher</b>	-0.112 (-0.42)	-0.333 (-1.21)
<b>Controls for Income Group</b>	No	Yes
<b>Controls for Credit Score (FICO third order polynomial)</b>	Yes	Yes
<b>Number of Observations</b>	1,000	996
<b>Pseudo R-squared</b>	0.0840	0.1158

Note: \*, \*\*, and \*\*\* indicate significance at the 10%, 5% and 1% levels, respectively.

Column 1 of Table 5.2 presents the coefficient estimates for the basic specification and column 2 includes controls for income group.<sup>97</sup> There is no significant difference between men and women in the likelihood of experiencing a confirmed error. In contrast to the raw data, the regression analysis also shows no significant difference in the likelihood of having a confirmed error due to education level.<sup>98</sup> The age and race of the participant does appear to be associated with confirmed errors; controlling for credit score and other characteristics, older participants are more likely to have confirmed errors and white participants are less likely to have confirmed errors.

Although we control for average FICO score in this regression analysis, there may be unobserved traits that are correlated with the race or age of the participant and the likelihood of experiencing an error. Unfortunately, the data is not rich enough to explore all of the potential explanations for the statistically significant relationships observed in Table 5.2. However, we are

<sup>97</sup> Specifically, a dummy variable was included for the possible income groups: <\$25,000; \$25,000-\$49,999; \$50,000-\$74,999; \$75,000-\$99,999; \$100,000-\$149,999; \$150,000-\$200,000; >\$200,000; and “Declined to Answer.” There were 45 participants who refused to answer the question on income range.

<sup>98</sup> In the specification presented we use a dummy variable for whether the participant has at least a bachelor’s degree. In another specification not reported we control for education level using the four categories described in Table 5.1. The results do not change qualitatively.

able to examine the degree to which credit reports differ for particular classifications of participants. Taken together with the different rates at which participants experience certain errors and the likelihood of these errors resulting in a score change, we may hypothesize about what is driving the significant relationships of Table 5.2.

Table 5.3 presents the average number of collections accounts, total number of accounts, number of inquiries, number of derogatory public records, and frequency of bankruptcies on the credit reports of participants who are white or non-white and who are also over 40 years old or aged 40 or younger.<sup>99</sup> While non-white and white participants seem to generally have the same total number of accounts on their credit reports, non-white participants have more collections accounts, more inquiries for credit, more derogatory public records, and a higher percentage of bankruptcies. On the other hand, participants 40 and younger have more collections accounts and a greater number of inquiries, while participants older than 40 have a greater number of total accounts, derogatory public records, and higher frequency of bankruptcies.

Recall from Table 4.7 that the most common types of errors are errors in tradeline information (such as incorrect late payment information or wrong balances listed) and errors in collections accounts. The different components on credit reports for non-white and white participants (e.g., the difference in collections accounts) may be the driving factor for the significance of the coefficient on white participants in Table 5.2. That is, it is unlikely that white participants have fewer errors purely because they are white, rather, it is the lower number of collections accounts on which there may be a potential error that leads to white participants being significantly less likely to have errors. The same discussion holds for age; it may not be that age is likely to result in errors, but the fact that older participants have more accounts and more derogatory public records in which to have potential errors that leads to a positive coefficient estimate in Table 5.2.

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<sup>99</sup> Although age is included as a continuous variable in Table 5.2, we break down the elements of a credit report by two age categories: aged 40 and under or aged over 40 and over. In separate analysis not reported, we find that participants over 40 have significantly more errors than participants 40 and younger.

**Table 5.3 Information on Credit Reports for Different Types of Participants**

	(1)	(2)	(3)	(4)	(5)
	<b>Collections Accounts</b>	<b>Total Number of Accounts<sup>100</sup></b>	<b>Number of Inquiries</b>	<b>Number of Derogatory Public Records</b>	<b>Percentage of Bankruptcies</b>
<b>White</b>	0.72	19.89	1.25	0.20	0.08
<b>Non-White</b>	2.57	18.37	1.77	0.36	0.11
<b>Aged 40 and under</b>	1.57	16.99	1.54	0.19	0.08
<b>Aged 41 and over</b>	0.84	21.35	1.24	0.27	0.10

Recall from Table 5.1 that it appears participants who previously requested a credit report, previously disputed with a CRA, or do not pay more than the minimum balance monthly on their credit cards are more likely to experience errors on their credit reports. There is likely an association between thinking an error exists on a credit report and requesting a copy of the report. It may also be the case that individuals who have previously seen a copy of their credit report are more aware and capable of identifying and disputing errors. This association may be due to some unobserved trait (such as interest/scrutiny of personal credit information) that makes the consumer both more likely to have requested previous credit reports or disputed information in the past and also to identify and dispute errors with the study counselor. Finally, although it appears that consumers who pay more than the minimum balance or the entire balance of their credit cards each month experience a lower rate of errors, we find no statistically significant association between payment behavior and likelihood of a confirmed error.

When considering the information describing error rates and individual characteristics, it is important to remember that we have defined a confirmed error as one that was identified, disputed, and resulted in a score change. Due to the nature of the study and the use of consumer counselors, the dispute rate is relatively high. We cannot know, however, whether all potential errors were identified by the consumers and brought to the attention of the counselor. There may be some unobserved consumer characteristic (such as intensity or attention to detail) that caused more or less identification of errors. This unobserved characteristic also might be correlated with other observed characteristics, and our analysis is limited by the relatively small data set.

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<sup>100</sup> The total number of accounts is reported by FICO in the summary information (i.e., “Credit At-A-Glance”) on the first few pages of the credit reports.



## 6 Conclusions

Pursuant to Section 319 of the FACT Act, this study evaluates the accuracy of 1,001 voluntary study participants' credit reports. We document the outcomes of the 262 participants who challenged at least one credit report item through the FCRA dispute resolution process. As a result of the dispute process, 206 individuals had at least one credit report altered and 129 consumers experienced a credit score change on at least one report. At the report level, 399 reports were modified and 211 reports experienced a change in credit score. The score decreased for 16 reports and many of the 195 positive score changes were moderate; half of the 195 positive score changes were less than 15 points. However, for a small number of participants, credit score changes were large; 27 participants had at least one of their three credit scores increase by more than 50 points.

The error rates implied by the FTC 319 Accuracy Study at the credit report level are within the range of the error rate distribution established by previous studies. For example, an early study by U.S. PIRG suggests that as many as 79% of credit reports contain errors and a quarter of credit reports contain errors that might impact a consumer's ability to receive credit.

Alternatively, participants in a recent study by PERC identify potential errors in only 19% of the reports evaluated and find errors that could potentially affect credit scores (i.e. material errors) in only 12% of reports. We estimate that for the target population (individuals with credit histories) at least 24% of credit reports potentially contain errors and approximately 19% of reports may contain errors that are material. The national consumer reporting agencies altered approximately 70% of the reports with potentially material errors disputed by the FTC Study participants, as compared to 86% of the disputed reports in the PERC study and less than 55% by CDIA.<sup>101</sup>

Previous studies, including the FTC Pilot Studies, consistently over-sample individuals with relatively high credit scores. Sampling methods are important to studies of credit report accuracy, as individuals with relatively low credit scores tend to have more credit report errors. This is the first study of credit report accuracy to address the issue of sample composition. Specifically, with the primary goal of matching the national distribution of credit scores as closely as possible, we used a stratified sampling scheme whereby potential participants were solicited in waves and the proportions of invitees in various credit score strata were adjusted over time to meet sample targets.

Our findings suggest that self-selected samples without stratification (e.g., the PERC study) likely underestimate credit report errors in the target population. In addition, non-randomly selected samples of individuals who have been denied credit (e.g., the Andersen study and the statistics reported by CDIA) likely underestimate the proportion of credit report errors that would be resolved by the CRAs for the typical consumer. In sum, sample composition is critical to understanding credit score accuracy, as well as outcomes of the FCRA dispute resolution

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<sup>101</sup> It is worth noting that PERC study participants utilized the FCRA dispute process on only about two-thirds of the reports with potential errors. In contrast, 91% of the FTC Study participants who were provided dispute letters prepared by study associates confirmed they had mailed the dispute letters.

process. Therefore, sample construction and composition should be a priority in any future studies.

Although much can be learned from this study regarding error rates, it is important to recognize the study's limitations. First, the study was designed to identify errors that potentially harm consumers. Although some inaccuracies on credit reports may benefit consumers, this study makes limited effort to identify or correct these errors. Therefore, while 16 reports (0.53% of all reports) experienced a decrease in credit score as a result of the dispute process, this almost certainly represents a lower bound on the estimate of potential inaccuracies on credit reports that currently increase the credit score of consumers.

In addition, when calculating error rates, we limit the definition of a confirmed error to those instances when the CRA modifies a report in response to a dispute. There were 56 consumers who had no changes made to their report in response to their dispute and another 109 consumers whose reports were modified but some disputed items remained as originally specified on the reports. If true errors remain on these consumers' reports after completing the dispute process, the current FCRA dispute process is not serving these consumers well. We are able to estimate the change in credit score if all reports were modified as requested by the consumer; we find that 12% of credit reports would see an increase in credit score if all disputed items were modified, as opposed to the 7% that saw an increase in credit score through the actual dispute process.

Overall, the results of the study suggest that while a notable number of consumers may have inaccuracies on their credit reports (21% of the participants and 13% of the credit reports have inaccuracies), the impact of these errors on credit scores is generally modest (an average of an 11.8 point increase in score) and often there is no change in the credit score of the report (63% of disputed reports do not change score). For a few consumers, however, the impact is large. Roughly 1% of the reports in the sample experienced a credit score increase of more than 50 points and this percentage doubles if every consumer allegation were modified as requested. Consumers concerned that their credit reports may contain errors should continue to examine their credit reports regularly through the use of <https://www.annualcreditreport.com> and follow the FCRA dispute process when inaccuracies are identified.

## **Appendix A: Comparison with PERC Study**

The FTC Study and PERC Study are similar in many respects, including the overall objective of producing a statistically reliable evaluation of credit report accuracy. Both studies draw from a large sample frame and achieve a response rate close to 4%. The two studies are also similar in their main design; consumers identify errors in their own reports. When inaccuracies are identified, in both studies the consumer disputes the allegedly incorrect information through the FCRA process. In addition, both studies are careful to use a rescoring method that isolates the change in score due solely to the modification made as a result of the dispute process.

### ***A.1 Differences in Methodology***

There are several important notable distinctions between the studies, some of which are discussed in the PERC Study regarding the FTC pilot study methodology. Although it is unlikely to drive large differences in results, it is worth noting that the PERC sample used VantageScore credit scores while the FTC Study uses the more-widely utilized FICO credit score. The two scoring products may differ in how certain information is incorporated.

Although both studies yielded low response rates, the initial sampling frames are quite different. The sample frame in PERC is drawn from consumers who participate in Synovate's research panel. The invitation pool used by PERC to generate their sample of participants is designed to reflect the U.S. Census data on demographic characteristics including age, household income, race/ethnicity, marital status, and gender. In contrast, the sample used in the FTC Study is a direct large random sample from the *population of interest*; people with credit histories at the three national CRAs. In Section 3 we discuss how the participants in the study compare to non-participants on characteristics other than credit score. It is important to remember that the sample of participants in both the FTC Study and the PERC Study are not truly random samples. Although the sampling frame for both studies may be a random sample, participants must choose to partake in the study and that generates some voluntary participation bias (discussed in more detail in Section 3).

By study design, the sample of participants in the FTC Study conforms closely to the distribution of VantageScore credit scores at very refined levels of partition. The PERC Study, in contrast, over-samples participants with higher credit scores and the lower credit score ranges are under-represented. More specifically, 53% of the PERC participants have VantageScores above 800 and 29% have scores below 700. Using roughly 200,000 records provided by the three national CRAs to determine the distribution of VantageScore credit scores, it appears that only 42% of consumers have VantageScores above 800 and almost 38% have scores below 700. Given the link between lower credit scores and the propensity to have a credit reporting error, the distribution of credit scores in the participant sample is an important determinant in producing reliable, unbiased estimates of credit reporting accuracy.

The method for identifying errors differs across the studies as well. PERC used an online survey to have respondents review their credit reports and gave them written instructions with FAQs. The consumers also filed their own disputes. The FTC Study used research associates (referred to as "coaches" in the PERC Study) who helped participants review their credit reports, advised

participants on how to file disputes with the CRAs, and helped the participants prepare dispute letters. PERC notes that the use of consumer coaches requires the consumer to make a certain commitment that may (1) lead to fewer consumers participating because they are uncomfortable with a third party reviewing their personal credit reports, and (2) have an unobservable impact on sample selection because consumers who could afford the extra time may be more likely to participate.

Despite these concerns, the use of study counselors did not seem to have a major effect on response rate; the PERC Study had a 4.1% response rate and the FTC Study has a 3.9% response rate. The other PERC objection to the use of coaches is that consumers with more time available will be more likely to participate. If there is some unobserved consumer characteristic that is positively correlated both with having more time to participate in a phone interview than an online survey and the likelihood of identifying credit reporting errors, then participants in the FTC sample would be more likely to identify errors than PERC participants. It is unclear, however, why such an unobserved characteristic would exist. By using study counselors, the FTC Study identifies not only what is allegedly incorrect on the credit report, but also the action that would make the information correct (e.g., remove a 60-day delinquency and replace it with a 30-day delinquency). The potential effect of the difference in error identification method is discussed in more detail below.

Once an alleged error is identified and disputed by the consumer, the credit report may be modified and the credit score of that report might change. The FTC Study uses a “frozen file rescoring method,” so that the score of the initial report reviewed by the consumer is compared to what the score would be on that same report if the alleged inaccuracy were corrected. The PERC Study uses a “real time rescoring method” that occurred after the dispute process; the relevant CRA scored the new credit report prior to making modifications and then applied the result of the dispute and scored the report again. Because a credit score is determined by the entirety of a credit report, both methods are careful to rescore reports that differ only with respect to the disputed information; i.e., the rescoring applied only to actual changes directly related to the dispute. Thus, the main difference in rescoring method between the studies is whether the comparison (or initial) report is based on information at the time of review by the consumer or after the dispute process has been completed.<sup>a</sup>

The participants in the FTC Study generally drew credit reports from all three national CRAs. Due to the timing of the rescoring method and the “carbon copy” issue discussed in Section 1.4.4, however, the majority of PERC participants (62.5%) drew a single credit report and the remaining participants drew two or three credit reports. Participants in the FTC Study found errors in only one report 11% of the time; for the PERC Study participants who drew a single report at random from one of the CRAs, there was the possibility that the consumer drew an error-free report while a different CRA report might contain errors. PERC notes that the study

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<sup>a</sup> Because the FCRA dispute process takes up to 30 days, it is possible that new inaccurate information may be added to the consumer report during the process. Because the consumer does not review the new report, there are potential new inaccuracies that are not captured by PERC’s “real time” rescoring process. The likelihood of new inaccurate information being added to the consumer’s report while the dispute process occurs, however, is relatively small.

participants who drew one credit report were no less likely to identify errors than consumers who reviewed three credit reports and PERC reports all statistics at the report level. At the consumer level, however, if a consumer only reviews a single report there may be potentially material errors on the unexamined reports. As we present in Section 4, although consumers often identify the same error at multiple CRAs, it is also possible that a consumer who disputes with multiple bureaus identifies distinct items with each of those CRAs.

## ***A.2 Similarities and Differences in Results***

When reporting statistics, PERC uses the credit report as the unit of analysis as opposed to the FTC Study, which presents the analysis at both the credit report and case (consumer) level. Considering that lenders often use a composite of the consumer's three credit reports and credit scores in making a credit decision, we believe that the impact of material errors on a *consumer* is a more important metric for considering credit reporting accuracy. For making direct comparisons, however, we only consider the report level statistics here. Table A.1 presents the findings from the PERC Study and the comparable statistics from the FTC Study.

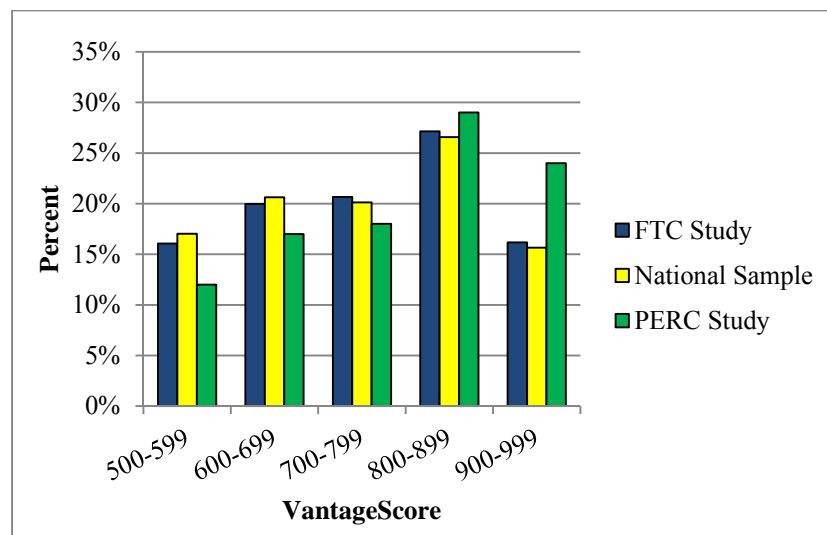
Participants in the FTC Study identify more reports with potentially material errors than PERC participants. PERC reports that 12.1% of reports examined had one or more potential tradeline disputes and only 5.4% of reports examined had material disputes filed. In the FTC Study, participants identified and disputed potential errors in 19.3% of the reports examined. This may be due to the use of consumer coaches or it may be due to differences in the sample composition with respect to credit score.

**Table A.1 Comparison of FTC and PERC Study**

	<b>PERC</b>	<b>FTC</b>
Number of reports examined	3,876	2,968
Percentage of reports with no identified potential disputes	80.8%	81.0%
Percentage of reports with one or more potential disputes (including reports with <i>only header errors</i> )	19.2%	Not Available
Percentage of reports where participant indicated they had disputed information or intended to dispute	15.6%	21.6%
Number of reports with any information disputed (i.e., dispute filed)	286 (7.4%)	708 (23.9%)
Number of reports with tradeline disputes filed (i.e., material information)	210 (5.4%)	572 (19.3%)
Number of <i>reports disputed</i> that were modified by the CRA in response to consumer dispute	181 (estimated based on PERC study report of % modified)	399
Percentage of <i>reports disputed</i> by consumer that leads to any modification	86.2%	69.9%
Percentage of <i>reports disputed</i> that resulted in a score change	59.1% (42% score increase, 17% score decrease)	36.9% (34.1% score increase, 2.8% score decrease)
Percentage of <i>reports examined</i> that resulted in a score increase	3.1%	6.6%
Percentage of <i>reports examined</i> that resulted in score increase of more than 25 points	0.9%	2.0%
Percentage of <i>reports examined</i> that had credit scores increase such that participant moves to a lower credit risk classification as a result of consumer dispute	0.5%	2.2%

The FTC Study was designed so that the distribution of participants' VantageScore credit scores would match the national distribution of VantageScore credit scores provided by the three national CRAs.<sup>b</sup> In Figure A.1 below, we show the distribution of FTC Study participants, PERC participants, and the national distribution estimated from the random sample provided by the three CRA databases. Because PERC did not have information on potential participants' credit scores, the invitation process was not designed to gather a representative distribution. The PERC sample over-represents consumers with high credit scores and under-represents consumers with low credit scores. Given that potential material errors are correlated with low credit scores, it is unsurprising that the FTC Study participants are more likely to identify potential errors relative to the PERC sample.

**Figure A.1 Percent of Credit Reports in VantageScore Ranges**



It appears that the use of participant counselors increased the dispute rate conditional on identifying errors. Only two-thirds of the PERC participants who identified potential errors confirmed that they had filed a dispute with the relevant CRA (another 15% said they intended to file a dispute). FTC participants had the dispute letters prepared for them by the study counselor and filed at a much higher rate; 91% (239/262) of consumers with potentially material errors confirmed they had mailed the dispute letters). Assuming the PERC participants who did not file disputes had the same general rate of error as those who did file disputes, the PERC Study underestimates the confirmed error rate because 33% of reports with potential errors are not disputed.<sup>c</sup>

<sup>b</sup> PERC presents the distribution of study participants' VantageScores in comparison with the VantageScore data from one anonymous CRA.

<sup>c</sup> It is not likely that those consumers who chose not to dispute had the same error rate or types of errors as those consumers that did dispute. Synovate sent multiple reminders to the consumers who had not filed disputes. When asked why they did not plan to dispute, 61% of the remaining participants with potential errors responded that the error was either not significant enough to dispute or the participant was not certain the information was inaccurate.

As noted in Section 4.3, while it is interesting to observe the rate at which inaccurate information is contained in credit reports, it is more important to quantify the potential impact the inaccurate information may have on the consumer's credit score and access to credit. For this reason, both the FTC and PERC studies attempt to estimate the change in score a consumer would experience if the credit report were accurate. Although the timing of the rescoring differs across the studies, the conceptual approach is similar and both methods hold elements of the credit report constant to isolate the impact of potential modifications. Note that the PERC Study does not state the number of reports that had no modifications made, so we cannot distinguish in the PERC Study whether a modification resulted in a zero point score change or if the report was simply not modified.<sup>d</sup>

The potential decreases in score that might occur from modifying inaccurate information is very different across the two studies; PERC finds that 16% of dispute reports would decrease credit score if the information were corrected, but the FTC Study finds only 0.6% of credit scores would decrease. This difference may be due to the different samples of the studies or the methodology (consumer counselors versus self-guided identification). Although the PERC study does not expand on what types of modifications lead to decreases in score, it is possible that the score decreases are due to removals of inactive accounts.<sup>e</sup>

Participants in the FTC Study were well-informed about what constitutes negative information on their credit reports. The standard FICO credit report provides substantial explanation of factors that determine the individual's credit score and highlights the specific information that is hurting the score on the first few pages. In addition, the use of study counselors provided the consumers with deeper understanding of the elements of their own credit file. Throughout the interview, when the consumer identified a potential inaccuracy, the study counselor would provide a standard disclaimer that disputing some information might have an adverse impact on credit score. Thus, consumers in the FTC Study were likely more focused on the elements that were identified as negative on the credit report and were less likely to dispute the potentially inaccurate items that might decrease their score if corrected.<sup>f</sup>

Examining the rate of score *increases* shows another striking difference between the PERC and FTC Study; PERC only finds 3.1% of reports examined had a score increase after modification as opposed to 6.6% in the FTC Study. Although the frequency of score increases is different, the distribution of score increases is similar. PERC notes that “of the 130 credit reports with one or

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<sup>d</sup> The PERC Study states that five reports were unable to be scored due to insufficient credit reporting information and 40% of disputed reports had no change in score.

<sup>e</sup> Although removing an inactive account corrects the error of classifying a closed account as open, the removal introduces a new error of omission, and shortens the credit history of the individual (potentially reducing credit score).

<sup>f</sup> The participants in the PERC Study were provided with a Guidebook to help identify potential errors. In describing credit files and credit scores, the Guidebook states that “the presence of too many open accounts can have a negative impact on your score, whether you're using the accounts or not.” Thus, PERC participants may have been more likely to dispute accounts that were listed as open that should be closed, whereas FTC participants may have been more likely to identify this scenario as possibly positively impacting their credit score.



more tradeline modifications resulting in credit score increases, 65 percent (84 reports) increased by less than 25 points.” (p. 42). In the FTC Study, 63% of reports with increases in score are increases of between 1 and 25 points. Recall that the scale used for VantageScore and FICO credit score are different, but the findings from both studies suggest that modifications to correct an alleged inaccuracy generally do not lead to very large changes in score.

Note that Table A.1 above references the percentage of *reports examined* that have more than a 25 point increase; the difference across studies in the proportion of reports with large (25 point) score increases (i.e., 0.9% of reports in the PERC Study versus 2.0% in the FTC Study) is an artifact of participants in the FTC Study generally identifying and disputing errors at a higher rate than PERC participants. Overall, relative to reports examined, the FTC Study resulted in a higher percentage of reports with alleged inaccuracies, a higher percentage of disputes filed, and a higher percentage of reports with positive changes to credit score. Relative to the PERC Study, the participants in the FTC Study were also more likely to have an increase in score that crossed some credit score threshold associated with different risk levels.

<b>SOLICITATION/CONTRACT/ORDER FOR COMMERCIAL ITEMS</b> <i>Offeror to Complete Blocks 12, 17, 23, 24, &amp; 30</i>					1. Requisition Number 29-00454		PAGE 1 OF 14		
2. Contract No.		3. Award/Effective Date		4. Order Number		5. Solicitation Number FTC-10-Q-0007		6. Solicitation Issue Date Jan 22, 2010	
7. For Solicitation Information Call:		a. Name Sheila Hopes shopes@ftc.gov			b. Telephone Number (No collect calls) 202/326-2588		8. Offer Due Date/Local Time March 5, 2010 / 12:00 PM		
9. Issued By  OFFICE OF ACQUISITION FEDERAL TRADE COMMISSION 600 PENN. AVENUE N.W. ROOM 779 WASHINGTON, D.C. 20580		Code 0617-04		10. This Acquisition is <input checked="" type="checkbox"/> Unrestricted <input type="checkbox"/> Set-Aside % for <input type="checkbox"/> Small Business <input type="checkbox"/> Emerging Small Business <input type="checkbox"/> HUBZone Small Business <input type="checkbox"/> Service-Disabled Veteran-Owned 8(a) NAICS: 541910 Size Standard: _____		11. Delivery for FOB Destination Unless Block is Marked.  <input type="checkbox"/> See Schedule		12. Discount Terms	
15. Deliver To OFFICE OF ACQUISITION FEDERAL TRADE COMMISSION 600 PENN. AVENUE N.W. ROOM 779 WASHINGTON, D.C. 20580		Code 0617-04		16. Administered By		Code		13a. This contract is a rated order under DPAS (15 CFR 700)	
17a. Contractor/Offeror		Code		Facility Code		18a. Payment Will Be Made By		Code	
Telephone No.		TIN:							
17b. Check if Remittance is Different and Put Such Address in Offer. <input type="checkbox"/>				18b. Submit Invoices to Address Shown in Block 18a Unless Box Below is Checked. <input type="checkbox"/> See Addendum.					
19. ITEM NO.		20. SCHEDULE OF SUPPLIES/SERVICES		21. QUANTITY		22. UNIT	23. UNIT PRICE		24. AMOUNT
25. Accounting and Appropriation Data						26. Total Award Amount (For Govt. Use Only)			
<input checked="" type="checkbox"/> 27a. Solicitation incorporates by reference FAR 52.212-1, 52.212-4. FAR 52.212-3 and 52.212-5 are attached. Addenda <input checked="" type="checkbox"/> are <input type="checkbox"/> are not attached		<input type="checkbox"/> 27b. Contract/Purchase Order incorporates by reference FAR 52.212-4. 52.212-5 is attached. Addenda <input type="checkbox"/> are <input type="checkbox"/> are not attached							
<input type="checkbox"/> 28. Contractor is required to sign this document and return _____ copies to Issuing Office. Contractor agrees to furnish and deliver all items set forth or otherwise identified above and on any additional sheets subject to the terms and conditions specified herein.				<input type="checkbox"/> 29. Award of Contract: Reference. _____ Offer Dated _____. Your offer on Solicitation (Block 5), including any additions or changes which are set forth herein, is accepted as to items:					
30a. Signature of Offeror/Contractor				31a. United States of America (Signature of Contracting Officer)					
30b. Name and Title of Signer (Type or Print)			30c. Date Signed		31b. Name of Contracting Officer (Type or Print)			31c. Date Signed	
32a. Quantity in Column 21 Has Been <input type="checkbox"/> Received <input type="checkbox"/> Inspected <input type="checkbox"/> Accepted, and Conforms to the Contract, Except as Noted: _____									
32b. Signature of Authorized Government Representative				32c. Date		32d. Printed Name and Title of Authorized Government Representative			
32e. Mailing Address of Authorized Government Representative						32f. Telephone Number of Authorized Government Representative			
						32g. E-mail of Authorized Government Representative			
33. Ship Number		34. Voucher Number		35. Amount Verified Correct For		36. Payment <input type="checkbox"/> Complete <input type="checkbox"/> Partial <input type="checkbox"/> Final		37. Check Number	
<input type="checkbox"/> Partial <input type="checkbox"/> Final		38. S/R Account Number		39. S/R Voucher Number		40. Paid By			
41a. I certify this account is correct and proper for payment				41b. Signature and Title of Certifying Officer		41c. Date		42a. Received By (Print)	
								42b. Received At (Location)	
						42c. Date Rec'd (YY/MM/DD)		42d. Total Containers	

**SCHEDULE Continued**

Item No.	Supplies/Services	Quantity	Unit	Unit Price	Amount
0001	<p>Conduct a national study of the accuracy of consumer reports in connection with Section 319 of the Fair and Accurate Credit Transactions Act of 2003, Pub. L. 108-159 (2003). The national study plans to employ both a study contractor and a mailing contractor, and it further plans to obtain the assistance from a national credit reporting agency in identifying a large nationwide sample of potential respondents.</p> <p>Please see Section C - Description/Specifications/Work Statement</p> <p>The contractor's proposal for this study shall include a detailed work plan. The plan shall be divided into six (6) periods detailing how the contractor will execute and complete this project over a total of 66 weeks. Please see work statement for more details.</p>	1	LT	_____	_____

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1. STATEMENT OF WORK ..... 4 - 14\*

\*Remainder of the public solicitation is not relevant for attachment to the December 2010 Report to Congress. Complete solicitation may be found at Fed BizOps; Solicitation FTC 10-Q-0007; Jan 22, 2010.

## 1. STATEMENT OF WORK

**SECTION C**  
**Description/Specifications/Work Statement**  
**(Study Ktr)**

**C. 1 Background**

The FTC plans to conduct a national study of the accuracy of consumer reports in connection with Section 319 of the Fair and Accurate Credit Transactions Act of 2003, Pub. L.108-159 (2003). The overall design for this study has been announced in federal register notices.<sup>1</sup> Potential contractors for the study may review these notices so as to better understand the context for the scope of work. Among other things, the notices summarize extant FTC Reports to Congress (with Web site references) regarding two pilot studies. In contrast to these pilot studies, the FTC now plans to employ both a *study contractor* and a *mailing contractor*, and it further plans to obtain the assistance from a national credit reporting agency in identifying a large nationwide sample of potential respondents.

**C.2 Scope of Work to be Performed by the Study Contractor**

*Part 1.* In broad terms, the required tasks are the following (further detail in Part 2):

Task 1. Describe the procedures used by the contractor to ensure that all sensitive data (whether in paper or electronic format) are appropriately secured, stored, transmitted, and ultimately disposed of, as consistent with the guidelines in the FTC's Safeguards Rule.<sup>2</sup>

Task 2. Develop a Web site at which consumers can review the steps of the study and, if interested, register to participate in the study, inclusive of providing an electronic signature for their consent to the terms of the study. For those who do not have Internet access, provide an alternative procedure to mail the appropriate disclosures and study steps to the respondent and then receive the enrollment information and the consumer's signed consent in paper form.

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<sup>1</sup> The respective URLs for July 2009 and October 2009 notices are:  
<http://www.ftc.gov/os/fedreg/2009/july/090720nationalcollection.pdf> ;  
<http://www.ftc.gov/os/fedreg/2009/october/091016faircreditcollection.pdf> .

<sup>2</sup> See, <http://www.ftc.gov/bcp/online/pubs/buspubs/safeguards.htm>. The FTC's Safeguards Rule addresses three basic areas: how employees or others handling the data are managed (i.e., instructions, training, limitations, discipline, etc.); how information systems are secured (i.e., storage, transmission, disposal, etc.); and how system breaches or failures are addressed (i.e., prevention, detection, response, etc.). As the guidance emphasizes, the requirements of the Rule are designed to be flexible and each institution may implement safeguards appropriate to the circumstances. As part of the safeguards, the contractor and any subcontractors who are part of the contractor's team shall be required to sign the FTC's *Nondisclosure Agreement For Contractors* (attached).

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Task 3. Construct a nationwide random sample in a range of 750 - 1,000 participants who have given the contractor permission to review their credit reports (re sample size, see detail in Part 2). Among various goals in creating the sample, chief is to obtain a set of consumers having a distribution of credit scores that matches, i.e., is not statistically different from, the national distribution of credit scores. The task of obtaining the desired distribution of scores is accomplished in close consultation with FTC staff, involving the creation of a designated database (called "FPAR"; see Part 2). The contractor's proposal shall identify the type of score to be used; e.g., a FICO score or some other score.

Task 4. State the procedure whereby study participants (hereinafter, *participants* or *consumers*) draw their credit reports from the three national consumer reporting agencies – Equifax, Experian, and TransUnion (the "CRAs").<sup>3</sup> The contractor shall budget funds from the proceeds of the contract in order to pay for participant credit reports and credit scores. As further explained in Part 2, the contractor shall also budget funds to pay up to \$50,000 for financial incentives relating to consumer participation (see detail on Task 4, Part 2).

Task 5. Train and use *consumer coaches* who will work with the consumers to (a) examine their credit reports in-depth, (b) help the consumers identify potential errors, and (c) help clear up common misunderstandings they may have about information in

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<sup>3</sup> The three credit reports for an individual consumer must be drawn on the same day; reports that pertain to different consumers may be drawn on different days.

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their reports.<sup>4</sup> Further, the contractor shall have training materials and procedures to ensure that different coaches are consistent in how they instruct and interview the consumers.

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<sup>4</sup> The task thus involves helping consumers distinguish between a misunderstanding and a potential error, and may involve educating a participant. As one example, a divorced person may not recall an earlier loan jointly signed with the ex-spouse; she may further believe that, after a divorce, information about this loan is removed from her credit report. Or, the consumer may believe that Credit Bureau A was deficient in its report simply because Credit Bureau B gave certain correct information, which was not contained in A's report. It is important that the expertise of the contractor includes an awareness of common consumer misunderstandings and knowing how to advise the consumer.

Task 6. Present a list of credit-related factors that will be employed to identify a *material dispute*. At a minimum, this list shall include criteria specified in Part 2. The contractor's proposal may present additional factors that have bearing on a consumer's creditworthiness (i.e., factors that have bearing on eligibility for credit, terms of credit, cost of insurance, etc.). The criteria shall apply to all credit scores and the contractor shall not use a "cut-off" score (i.e., a designated score above which the stated criteria would not be employed).

Task 7. Facilitate a participant's contact with CRAs or data furnishers to dispute credit report items that the participant alleges to be inaccurate. For consumers who have alleged material errors and expressed an intention to file a dispute, the contractor shall prepare a dispute letter and also provide a stamped pre-addressed envelope to the relevant CRAs.<sup>5</sup> The contractor will ascertain from the consumer whether the letter correctly describes the alleged error(s); upon confirmation, the participant shall sign and send the letter. (The contractor shall state and employ a procedure to discern whether the consumer has sent the dispute letter.)

Task 8. Determine any changes in the participant's credit score resulting from changes in credit report information in the context of a dispute. As part of the comparison between "before" and "after" credit scores for disputed items, the contractor must have – and shall employ – the expertise to rescore a credit report regarding potential changes directly related to the contractor's review (i.e., a rescoring of the consumer's *frozen file* in regard to alleged errors). As explained in Part 2, rescoring will apply to alleged material errors and (separately) to errors that are confirmed via the FCRA dispute process.

Task 9. Budget funds from the proceeds of the contract in order to obtain new credit reports and scores from the CRAs for those consumers who have disputed credit report information.

Task 10. As specified in Part 2, assist FTC staff in preparation for a non-response bias study.<sup>6</sup> The responsibility for performing a non-response bias study in keeping with OMB regulations will be assumed by FTC staff. Certain data collected by the contractor will be useful in aiding the FTC in performing its study of the non-respondents (see Part 2).

In developing the procedures for implementing the tasks, the proposal shall include, where feasible, written protocols; specifically, it shall include written protocols for (a) the initial screening of respondents, (b) the in-depth review of credit report information, and (c) formats used to tabulate the results of each credit report review. The proposal shall also provide copies of training materials

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<sup>5</sup> Consumers who allege immaterial errors should not be encouraged to file a dispute. Regarding immaterial disputes, the contractor shall still *offer* to prepare a dispute letter for all consumers who want to dispute information not deemed to have bearing on creditworthiness. Instructions on how to file shall be made available to all study participants.

<sup>6</sup> The likely need to address a potential non-response bias is discussed in the cited FRN of July 20, 2009 (page 35194).



for the consumer coaches and the contractor's follow up letter sent to consumers after their receipt of the official FTC invitation letter.<sup>7</sup>

*Part 2. Further detail and information regarding the contractor's required tasks.*

*Detail on Tasks 1 & 2 (safeguarding the data and the use of a registration Web site)*

(A) These tasks will involve a Privacy Impact Assessment (PIA) undertaken by the FTC in cooperation with the contractor. The nature of this assessment will be similar to the PIA performed in the second pilot study.<sup>8</sup> The registration Web site shall be pre-tested and ready for use by the end of 6 weeks from the date of a contract award. In the event that a contractor believes such a time frame could not be met, a detailed justification must be presented in the contractor's proposal.<sup>9</sup>

(B) In consultation with FTC staff, the registration procedure will include a page with certain closed- ended questions that address a consumer's experience with, or knowledge of, credit-related matters (e.g., whether the consumer is in the market for a mortgage or car loan, ever looked at their credit report before, ever disputed credit report information, and other questions pertinent to their experience/knowledge of credit-related matters).<sup>10</sup>

(C) in consultation with FTC staff, a successful contract award will involve procedures that ensure that all credit-related data are maintained separately from personal identifying information and that all communications between FTC staff and the contractor regarding potential respondents, actual respondents, or non-respondents will occur only via abstract ID numbers assigned for the purpose of the study.

*Detail on Task 3 (recruitment phase of the study and the creation of the sample)*

The contractor's planning for the study shall consider two proposals for sample size, namely N = 750 and N =1,000.<sup>11</sup> For either case, the contractor shall develop a designated database, called the "FTC Participant Response Database" ("FPAR") in EXCEL format. FPAR will contain no personal identifying information; in particular, it will not contain the name, address, or social security number of any participant. As responses are received through the

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<sup>7</sup> The sending of FTC invitation letters is handled by the FTC's mailing contractor. Further, in consultation with FTC staff, the study contractor shall send a follow up letter that identifies the study contractor to the consumer and reaffirms the invitation. Staff estimates that over the course of the study, up to 10, 000 such follow up letters from the study contractor may be needed. (In addition, FTC mailings may include a second agency letter to certain potential respondents; this 2<sup>nd</sup> FTC letter would *not* require a follow up letter from the study contractor.)

<sup>8</sup> See, <http://www.ftc.gov/os/2008/12/P044804privacyimpactatt2.pdf> . Use of the registration Web site for the national study cannot commence until a PIA has been completed.

<sup>9</sup> n/a

<sup>10</sup> In order to expedite this inclusion, and not as a critical element for FTC evaluation of proposals, potential contractors are invited to submit their formulation of related questions.

<sup>11</sup> The study sample is potentially below the original plan of 1,000 participants. Reduction is uncertain at this time.

registration Web site and the contractor has drawn the person's credit reports and scores, the contractor will create a (row) record for each respondent with the following *initial* information: abstract ID number (as stated in the participant's FTC invitation letter), credit score, ZIP code, age, gender, ethnicity/race, the date stated on the FTC letter (month-day-year in numerical format), and the date the person replied to the letter through the registration Web site. The study contractor will share FPAR with FTC staff upon request. There will be multiple requests over the course of the recruitment phase. FTC staff will use FPAR information to send successive waves of invitation letters. By targeting the letters to desired subsets of respondents, a sample with desirable properties will be developed; for fuller context, see cited FRN, July 20, 2009 (P35194).

*Detail on Task 4 (drawing the consumer's credit reports and the payment of incentives)*

(A) FTC staff anticipates that securing the reports will involve directing the consumers to some Web site, e.g., the Web site(s) of Equifax, Experian, and TransUnion, or to some other designated Web site that is used to draw credit reports. (As an example, see the procedure used in the second pilot study.) For consumers who do not have Internet access – expected to be a small minority of the sample – the contractor shall provide a procedure to mail appropriate disclosures and study steps to the respondent and then receive the enrolment information and the consumer's signed consent in paper form. Further, for such consumers, the contractor shall provide either (a) one-time Internet access to the participant for drawing the credit reports by providing a payment for (up to) 1 hour use at an Internet café or public library, or (b) have a procedure whereby the *contractor* sets up accounts with the CRAs and submits the consumer's information to draw the credit reports (e.g., the contractor enters the consumer's SSN, address, date of birth, etc.). As needed, the consent form certifying the consumer's agreement to the terms of the study will further provide written consent for the latter procedure.

(B) FTC invitation letters will state financial incentives for consumer participation. The contractor shall budget funds to pay for these incentives and may use \$37,500 as a reliable estimate for a study involving N = 750 participants and may further use \$50,000 as a reliable estimate for N = 1,000 participants.<sup>12</sup>

*Detail on Task 5 (use and training of consumer coaches)*

Depending on the study's sample size, the contractor's proposal shall provide in range of 8 - 10 consumer coaches, so that the study sample may be divided into consumer groups of not more than 100 persons per group. The assignment of consumers to the coaches shall be randomized by a procedure set forth in the proposal. At the conclusion of the study, the

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<sup>12</sup> The study contractor does not send the official invitation letter. To aid the contractor's planning for the study, FTC staff supplies the following information. Invitation letters sent to individuals with credit scores equal to or above a FICO- equivalent score of 700 will offer the participant \$25 upon completion of their work. Individuals with FICO-equivalent scores below 700 will be offered \$25 upon agreeing to participate and another \$50 at completion of their work. It is estimated that approximately half of the participants will be paid \$25 and the remaining half paid \$75. FTC staff will inform the contractor of the ID numbers of participants who qualify for the stated payments. The FTC will reimburse the contractor for any incentive payments beyond the guidelines stated above. As an example involving reimbursement, if a successful contract award is granted for 750 participants and (hypothetically) the contractor pays \$39,000 for incentives, the FTC will reimburse the contractor for the unexpected \$1500.

contractor shall perform a statistical analysis to determine whether study results were significantly different across the coaches.<sup>13</sup>

*Detail on Task 6 (criteria for a material dispute)*

The criteria shall include the following. An alleged error is deemed *material* if the consumer alleges an error regarding any of: (1) negative items (such as late payments); (2) public derogatories (such as bankruptcy); (3) accounts sent to collection; (4) number of inquiries for new credit; (5) outstanding balances not attributable to normal monthly reporting variation; (6) accounts on the report not belonging to the person who is the subject of the report (“not mine”); or (7) duplicate entries of the same information (e.g., late payments or outstanding obligations) that were double-counted in the reported summaries of such items. The contractor may propose additional factors that have bearing on a consumer’s creditworthiness.

*Detail on Task 7 (contractor helps consumers with disputes of credit report information)*

The proposal should include 8 -10 templates, or exemplars, of the contractor’s preparation of consumer dispute letters (i.e., one template for each consumer coach). The use of a number of distinguishable templates reduces the possibility that a CRA might identify certain study participants by the uniform format in which disputes are expressed.

*Detail on Task 8 (rescoring of credit reports)*

First, for a consumer who alleges material error(s), a dispute shall be filed with each CRA that produced a report containing the alleged error(s). For each such report, the contractor shall rescore the original report (provisionally) as though all of the consumer’s provided information were accurate. Subsequently, upon conclusion of the dispute process, the contractor shall rescore each such credit report a second time after including the information that was either changed or deleted as a result of the dispute process.<sup>14</sup>

*Detail on Task 9 (new CRA credit reports and scores involving disputed information)*

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<sup>13</sup> To aid a contractor’s planning for the study, FTC staff believes there may be 3 or 4 waves of the FTC invitation letter. Successive waves are expected in intervals of 4 - 5 weeks, so that all mailings would be completed in 4- 5 months. Staff will coordinate these mailings with the study contractor according to the response rates for each prior wave. The initial wave is expected to be 3,000 FTC letters. In planning for the training of consumer coaches and their randomization over the set of participants, and recognizing that participants will also come in waves, the contractor’s proposal should allow that at least half of the coaches be ready to engage respondents after the first wave of FTC mailings, and that all coaches be ready upon the second wave of mailings. Upon randomizing the assignment of consumers to the coaches, one would expect similar outcomes for the coaches. Yet, by “the luck of the draw” a certain coach may have drawn (say) consumers with relatively lower credit scores than others, further yielding the outcome that this group alleges relatively more material errors than the other groups. The purpose of subsequent analysis is to assess whether such (or other) notable differences occurred and to provide explanations, where feasible, for statistically different results.

<sup>14</sup> If none of the consumer’s allegations lead to changes or deletions of credit report information, the second rescoring is obviated.

The new reports and scores from the CRAs are provided for the benefit of the consumer; the new scores must not be used as a “rescore” pertinent to some evaluation of the impact of any resolved errors (since these new scores will incorporate whatever new information has been adjoined to the consumer’s credit report during the course of the study.)

*Detail on Task 10 (assist FTC’s preparation for a non-response bias study)*

The contractor will initiate the development of a database, the “FTC Non-Response Database” (“FNON”) in EXCEL, shortly after the recruitment phase of the study has been completed. FNON will contain no personally identifying information; in particular, it will not contain the name, address, or social security number of any individual. The content and use of this database is described as follows:

(A) First, FTC staff will provide the study contractor with the ID numbers, credit scores, and ZIP codes of all individuals who were contacted by the mailing contractor (i.e., all individuals on the final SC list).<sup>15</sup> By consulting the work accomplished in Task 3, the contractor will then classify all of the individuals selected for contact into *participants* and *non-respondents*, and thereafter construct the FTC Non-Response Database using the information from non-respondents. FNON will initially have the following items: ID number, credit score, and ZIP code. The study contractor will share FNON with FTC staff upon request.

(B) After the completion of the recruitment phase of the study, the study contractor will receive the redacted credit histories for the set of individuals recorded in FNON, organized by ID number and redacted of all personal identifying information. The study contractor will expand FNON to include, for each ID number, the following information:<sup>16</sup>

- number of credit cards; number of active credit cards;
- number of late payments (ever);
- number of trade lines with 30 day late (ever), 60 day late (ever), 90+ day late (ever);
- number of trade lines currently delinquent;
- total credit card balances; total installment balances;
- number of trades opened in past year; number of inquiries in past year;
- number of accounts sent to collection; number of disputed trade lines;
- number of months covering the consumer’s file;
- reported bankruptcy (yes/no);
- other public record information (e.g., tax liens or any defaulted loans publicly recorded; yes/no).

Regarding non-credit information, for each of the designated ID numbers include (a) age, (b) gender (if available), (c) ZIP code, (d) number of prior addresses on file, (e)

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<sup>15</sup> See cited FRN of July 20, 2009 (page 35194 - 35195) for fuller context regarding the SC list and its relation to the larger SPC list.

<sup>16</sup> The expected number of row entries is estimated to cover 7,000 – 9000 IDs, depending on initial sample size of study participants (750 – 1,000; see Task 3). The contractor need not devote additional resources to *search* redacted credit histories for the required information. The information will be supplied to the contractor in the above manner for each ID number in FNON.

number of AKA identities on file, and (f) employment status (“yes” if employed or likely to be; “no” otherwise. Information compiled in FNON shall be based on the most recent information as of date of request and shall not contain personal identifying information.

### Part 3. Deliverables

In reference to the deliverables stated below, the contractor’s proposal to execute the contract shall include two bids: one for performing a contract that involves N = 750 study participants and a second bid for a study involving N = 1000 participants.

After all study participants have completed their work, the study contractor will use the information provided by the participants to expand FPAR as described and required below.<sup>17</sup> The additional information placed in the expanded FPAR will be, for each individual ID *and for each credit report*: the number and type of alleged material errors, an initial rescore of each credit report involving alleged material errors (provisionally, using the consumer’s information as though it were accurate), the number and type of alleged material errors that were changed or deleted via the dispute process, the contractor’s rescore after correction for the material errors in each credit report confirmed by the dispute process, additional demographic information about the participants obtained at the end of the study (e.g., income and educational level), and all information that is needed for the contractor to perform the required tabulations set forth below in this section; see, especially, the information related to parts (B) and (C). The contractor will deliver the updated FPAR to the FTC when the database is complete.

The contractor shall submit a written report on the study within 66 weeks from the date of a contract award. The report shall include a description of the study design that was implemented and procedures used to safeguard a consumers’ personal information. The report shall also:

(A) Wherever feasible, present written copies of protocols that were employed in the study. At a minimum, include the protocols used for the initial screening of respondents, the in-depth review of credit report information, formats used for recording the results of a consumer’s credit report review, and copies of the materials used to train and instruct the consumer coaches.

(B) Tabulate the results of the review of the participants’ credit reports regarding:

(1) types and frequency of *alleged* credit report errors, including both material and immaterial errors; further, regarding accounts that were alleged as not belonging to the person who is the subject of the report (i.e., “not mine”), identify instances (if any) in which the consumer alleged ID theft as the source of the error and tabulate such instances by frequency and type of transaction (e.g., whether the account involved a mortgage, automobile loan, a credit transaction, etc.);

(2) regarding *alleged material errors* in a credit report, tabulate their seriousness in terms of a *potential* change in credit score (e.g., no change, 1-10 point change, 11-20 point change, etc.) as determined by the initial rescoring of the consumer’s frozen file (see Task 8);

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<sup>17</sup> Again, the expanded FPAR will not contain any personally identifying information; specifically, it will not contain the name, address, or social security number of any participant.

(3) for items that were changed or deleted as a result of a dispute process,<sup>18</sup> tabulate the impact of such changes/deletions in terms of a change in credit score (e.g., no change, 1-10 point change, 11-20 point change, etc.) as determined by the second rescoring of the reports (see Task 8); further tabulate:

- (a) types and frequency of disputed information that was *changed*;
  - (b) types and frequency of disputed information that was *deleted*, further indicating (where feasible) whether the deletion occurred by instruction of the data furnisher or by action of a CRA;
  - (c) again for information that was changed or deleted via the dispute process, identify those instances (if any) in which one CRA changed or deleted certain information in keeping with the consumer's allegation and another CRA, *on the same disputed item(s)*, maintained the information as originally reported; further tabulate such instances by type and frequency.
- (4) for disputed information that was *maintained* as originally reported,
- (a) the types and frequency of such disputed information (covering both material and immaterial disputes);
  - (b) for *alleged material errors* in (4), the potential impact of such disputed information on a consumer's credit score, as measured by the initial rescoring of the consumer's frozen file (again tabulated by 10 point movements in credit scores).
- (5) considering *material differences* in information across the three credit reports of a consumer (if any), tabulate by type and frequency those instances in which, as a result of a dispute, an initial difference in material information was ultimately changed or deleted.

(C) Regarding Task 10, which addresses the contractor's assistance with the FTC's non-response bias study, the contractor shall deliver the results of the following:

- (1) a certain comparison of participants to non-respondents; specifically, the contractor shall test for statistically significant differences between participants and non-respondents on their initial credit scores and on their credit histories as listed by the factors in Part 2, Task 10(B);
- (2) within the class of participants, a certain comparison of "high contractor- effort" and "willing" participants;<sup>19</sup> specifically, the contractor shall test for statistically

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<sup>18</sup> The FCRA dispute process renders an outcome for each alleged error. Briefly, by instruction of the data furnisher, the following outcomes may occur: delete the item, change or modify the item (specifying the change), or maintain the item as originally reported. Also, a CRA may delete a disputed item due to expiration of a statutory time frame.

<sup>19</sup> In consultation with FTC staff, the defining differences between *high contractor-effort v. willing participants* will focus on "difficulty factors" (such as a need for follow up phone calls) experienced by the study contractor in helping participants complete all the steps of the study, and upon a comparison of their responsiveness to the FTC mailings (i.e., to which one of the two FTC mailings they responded and on the elapsed time before registering for the study).

significant differences between these two types of participants regarding their initial credit scores, the data regarding alleged credit report errors and their resolution (including results for rescoring credit report information from Task 8), and on their credit histories as listed by the factors in Part 2, Task 10(B).

#### Further Provision Regarding Deliverables.

The FTC reserves the right to obtain separately from the contractor *all data* collected during the course of this study, including all consumer credit scores and rescues that are generated in the performance of the required tasks. As noted above, the FTC has no intention of collecting any personal identifying information, sensitive or otherwise, on any participant or non-respondent. In lieu of personal identifiers, individuals will be identified by the abstract ID numbers assigned for the purpose of the study.

#### C.3 FTC and Contractor Documents

The COTR will notify the contractor when all work/services required have been completed. The COTR will further advise the contractor regarding the ultimate disposal of the data collected by the study.

#### C.4 Use of Data

In December 2012, the FTC expects to report its main findings on the FACTA 319 study to Congress. After the release of the FTC's Report to Congress, the contractor may request research use of data, after removing all personal identifying information. The contractor is permitted to say that it performed the collection of the data on behalf of the FTC. If the contractor desires such research use, application shall be made to the COTR. It is expected that the agency would respond favorably to such a request.



**Federal Trade Commission**

**Privacy Impact Assessment**

**for the**

*Registration Web Site for FTC's National Study of Credit Report Accuracy*

**October 2010**



## 1. System Overview

The Federal Trade Commission (FTC) is conducting a nationwide study on the accuracy of information contained in consumer credit reports, as required by Section 319 of the Fair and Accurate Credit Transactions Act of 2003. Researchers at the University of Missouri-St. Louis (the “University” or “UMSL”), which is serving as lead contractor for the FTC for this study, will be creating and using a Web site to register individuals who volunteer to participate (“registration Web site”).<sup>1</sup> Researchers will also create and maintain a database of anonymized credit reporting data obtained with the consent of such individuals. Researchers will use this data to analyze the accuracy of such credit reports, and to summarize their research results (without disclosure of any individual data) for the FTC’s report to Congress. As required by the E-Government Act of 2002, the FTC is posting this privacy impact assessment (PIA) to explain to the public what information its researchers will be collecting and maintaining electronically about individuals, why it is being collected, and how it will be safeguarded to protect its privacy.

The study will review certain credit report information, and various procedures are in place to protect consumer privacy as much as possible. Notably, the employed procedures ensure that the study will not collect, maintain, or review any sensitive information in identifiable form. A summary of the procedures and safeguards is given here, along with references to sections where specific matters are addressed.

As noted above, the FTC’s researchers will be using a Web site in order to register individuals who will have been previously invited by mail to participate voluntarily in the FTC’s study. (A similar registration method was used in the second pilot study, which prepared for this national study.<sup>2</sup>) The purpose of the Web site presently being created is three-fold: (1) to determine that the individual is eligible to participate (e.g., 21 or older); (2) to confirm that the individual knows and consents to the terms of participation (e.g., to have their credit reports reviewed for accuracy by the FTC’s research team), and (3) to register the individuals who qualify and consent. The study group will comprise approximately 1,000 individuals.

By enrolling for the study at UMSL’s registration Web site, an individual will be authorizing the FTC’s researchers to obtain that individual’s credit report data – which will be redacted as explained below– from a private third-party industry entity, Fair Isaac Corporation (FICO), and to use such data to perform the Congressionally mandated study.<sup>3</sup>

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<sup>1</sup> See note 6 regarding the members of the research team.

<sup>2</sup> This Privacy Impact Assessment is similar to one performed earlier for a second pilot study; *Registration Web Site for the FACTA Credit Report Accuracy Study— Privacy Impact Assessment (February 2008)*. It may be accessed at <http://ftc.gov/os/2008/02/08022pia.pdf>.

<sup>3</sup> FICO maintains individual credit reporting data compiled from the national credit reporting agencies, and will be the source of the credit report data to be used in this study.

(continued...)

Participation in the study is voluntary, and there is no consequence for not participating. Study participants will provide very limited personal information to the registration Web site, mainly contact information such as name, address, telephone number, and email address (see Section 2.1 below). At the registration Web site, the person must also enter his or her assigned study ID number – a unique number communicated to the consumer in the FTC’s invitation letter – thereby identifying that individual as a solicited consumer. The individual is informed that this study ID, the individual’s email address, and an assigned password, randomly generated by the site, will be used (see detail in Sections 2.1 and 2.3) at FICO’s Web site ([www.myfico.com](http://www.myfico.com)) operated by FICO in cooperation with national credit reporting agencies, so that researchers and the study participant will have access to the individual’s credit report data. Through that site, study participants will also receive copies of their credit reports and scores free of charge.

The University researchers assigned to the study will print a copy of a participant’s credit reports from *myFICO.com* so that they may review these reports for accuracy with the consumer. These credit reports are partially redacted; i.e., date of birth is suppressed and most of the digits of the consumer’s SSN and of any account numbers are also suppressed in printing the report. In preparation for the review, University researchers will mail copies of these same reports to the participants. Credit report information that a participant alleges to be erroneous and that is material to creditworthiness is entered into a separate *research database* (Section 2.1) in the same redacted form in which it was received. This information will be provisionally re-scored (see note 6), and the challenged information will also be disputed by the study participant through a formal industry dispute process.<sup>4</sup> Both the outcome of these disputes and the re-scoring of the challenged information are entered into the research database.

Critical to the protection of the consumer’s privacy and the safeguarding of information is the separation between the registration Web site database and the research database of redacted credit report data to be used in the study.<sup>5</sup> The only information common to both databases is the set of study IDs. Each database is encrypted and password-protected.<sup>6</sup>

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<sup>3</sup>(...continued)

Neither the FTC, nor its research team, controls or operates the FICO Web site, which is funded and maintained by private sources. FICO will not be collecting or maintaining credit report data on behalf of the FTC, and their privacy practices and policies are not covered by this PIA.

<sup>4</sup> The study employs a dispute process set forth by the Fair Credit Reporting Act (FCRA), which allows consumers to dispute credit report items that they believe to be erroneous. The methodology for the study is set forth in a Federal Register Notice of July 20, 2009, 74 Fed. Reg. 35193, which includes a description of the FCRA dispute process.

<sup>5</sup> Additional information stored in this database is discussed in Section 2.1.

<sup>6</sup> Access to the registration database is granted to designated University researchers, who receive administrative passwords to perform their assigned work. Certain of these researchers  
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Only the University researchers and no other individuals or entities will have access to the data collected by the registration Web site or to the credit report database. Registration Web site data will associate participants' study IDs with their respective names and addresses, but this database does not contain information such as financial account numbers, SSNs, drivers' license numbers, or similarly sensitive information. The separate research database containing credit report data will associate such data with individual study IDs, but it will contain no other direct personal identifiers. Any electronic transmission of the information in these databases between persons assigned to the study, i.e., between or among University researchers, FTC staff, and FICO staff involved in the re-scoring process, will occur only in an encrypted and password-protected form. The handling and storage of data has also been designed to minimize a risk to participants from illegal hacking or intrusion.

At the conclusion of the study, the contractor will transfer the data from the research database to the FTC, identified only by study IDs and no other personal identifiers that could be used to re-identify individual participants. Importantly, the registration database, which relates a person's study ID to his or her personal identifying information, is not provided to the FTC (nor to anyone; see Section 3.3), and the contractor will be instructed to destroy the registration database. At the conclusion of the study, no personal identifiers that could be used to re-identify individual study participants will exist. (Section 7 addresses the destruction of the study's mailing list, to further eliminate the possibility of re-identification.)

## **2. Information Collected and Stored within the System**

### **2.1 What information is to be collected, used, disseminated, or maintained by the system?**

Regarding individuals who meet the study criteria<sup>7</sup> and who give consent to have their

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<sup>6</sup>(...continued)

are located at the University of Arizona (hereinafter, UA); the UA researchers are formally subcontracted under the lead contractor, UMSL. The UA researchers assist in reviewing credit reports with participants. All procedures for researchers who review reports with consumers are the very same, whether researchers are at UMSL or UA (hereinafter, collectively *University researchers*). Regarding the research database, each university has its local component, again with identical procedures. Over the course of the study, and by means of encrypted and password-protected files, UA's research database is progressively merged with the one at UMSL; collectively *the research database*. By separate agreement with FICO, the University researchers will also be working with FICO staff who will provisionally re-score material credit report information that study participants allege to be erroneous. FICO will have no access to any of data collected by the researchers other than redacted credit report data that the researchers will transmit to FICO for such provisional re-scoring (see Section 2.1.)

<sup>7</sup> At a screen that occurs before consent to the study is requested, the consumer is asked  
(continued...)

credit reports reviewed for accuracy with the research team (explained further below), the registration Web site will collect (or generate) and maintain the following information: (a) first name, (b) last name, (c) address (street, city, state, zip code), (d) phone number, (e) best time for calling (evenings, mornings, etc.), (f) email address, (g) a study ID number, and (h) an assigned password (randomly generated by the site and to be used subsequently in the study; see below).

The participant's study ID, which is provided in the FTC's invitation letter, is used by an individual to enter the registration Web site and is collected by this site. As explained below in Sections 2.3 and 2.8, the participant's email address, the password generated and assigned by the site, and the study ID are subsequently used for obtaining credit reports and scores at FICO's Web site, *myFICO.com*.

Certain credit report information is collected in the course of the study. As noted earlier, University researchers print copies of participant credit reports from *myFICO.com* in order to review the reports for accuracy with the consumer. These reports are obtained by the researchers in a partially redacted form (i.e., date of birth is suppressed and most of the digits of the consumer's SSN and of any account numbers are also suppressed upon printing the reports).<sup>8</sup>

Items that affect creditworthiness and that are alleged to be in error by a participant are placed, in the redacted form received, in the collective *research database*.<sup>9</sup> Additional items recorded there are: a provisional rescoring by FICO of the challenged items;<sup>10</sup> the

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<sup>7</sup>(...continued)

to confirm ("yes / no") that the person is 21 or older, has a credit card or has used some form of credit, and is currently not employed by a credit bureau.

<sup>8</sup> Printed copies of these credit reports, along with any notes taken during the telephone interview, are maintained in a locked filing cabinet, further placed in a locked University office.

<sup>9</sup> Over the course of the study, two local components of the research databases are maintained; one at UMSL, another at UA. The type and format of data which UMSL researchers place in their local component of the database are the same as for UA. All data placed in either database are recorded only by study IDs. Periodically, via encrypted and password-protected files, the anonymized data under the study IDs from UA are *row-added* to UMSL's database.

<sup>10</sup> As noted earlier, see note 6, files with consumer alleged errors are subject to rescoring by Fair Isaac. University researchers will electronically transmit to Fair Isaac copies of files with any alleged "corrections" imposed. Before transmitting such files, the researchers ensure that all identifying information, if any, such as names, addresses, employer names, have been removed (further, the information is already redacted as described above). Only a study ID is used as the file identifier. Fair Isaac electronically returns the rescored file to University

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outcome of disputes<sup>11</sup>; the participant's original credit scores from the three national credit bureaus upon drawing the reports; discrepancies among the three reports;<sup>12</sup> brief notes about a consumer that critically affected participation (e.g., moved out of the country, illness, divorce, death of a family member); and certain demographic information collected at the conclusion of the study.<sup>13</sup> Again, all data placed in the research database are recorded only under study IDs. The database (both the UMSL and UA components) are encrypted and password-protected, and they do not contain any personal identifying information.

The University server for the registration Web site collects log information (e.g., IP address, date and time of visit) of individuals who visit the Web site, with or without registering for the study.

## **2.2 What are the sources of the information in the system?**

The contact information collected at the registration Web site (listed in Section 2.1) is obtained from individuals who voluntarily submit that information upon agreeing to participate in the study. The source for the consumer's assigned password (to be used at FICO's Web site) is the registration Web site, which randomly generates a unique password for each study participant. The source for a participant's study ID is the FTC invitation letter to the consumer. The source for demographic and similar information discussed in Section 2.1 is the participant, who again voluntarily submits the information. The source for the collected credit report information is *myFICO.com*, a Web site where study participants (as well as the public) may access their credit reports. The source for any re-scored data is also FICO. The source for miscellaneous notes that may added to

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<sup>10</sup>(...continued)

researchers. These transmissions occur in small batches; they are password-protected and do not involve personal identifying information, sensitive or otherwise. The resulting rescored items are entered in the research database.

<sup>11</sup> Outcomes of disputes are recorded as follows: item(s) deleted from a credit report by lender or data furnisher; item(s) changed in the report (with specific changes); item(s) kept as originally reported; and item(s) deleted by CRA due to the expiration of a statutory time frame.

<sup>12</sup> Examples are the following: one report lists an account as open and active, another report lists it as closed; one report lists a certain payment as late, another lists it as on time; one report lists a stated lien as discharged, another lists it as undischarged; and more generally, any information that is clearly discrepant among the three reports.

<sup>13</sup> There is a concluding survey that collects a participant's gender, ethnicity, income level, educational level, and similar such demographic information.

the research database are the FTC's researchers and the participants.<sup>14</sup>

### **2.3 Why is the information being collected, used, disseminated, or maintained?**

The reasons or purpose(s) of information collection at the registration Web site all relate to executing the FTC's national study: (1) to determine that an individual is eligible to participate (e.g., is 21 or older); (2) to confirm that the individual knows and consents to the terms of participation (e.g., to have their credit reports reviewed for accuracy by the FTC's research team), and (3) to register those individuals who qualify and consent.

The collected contact information will allow the FTC's researchers to communicate with study participants. Once the information has been collected by the registration Web site, a screen informs the participant they will be hyperlinked to the *myFICO.com* Web site maintained by Fair Isaac in order to obtain credit reports and scores. Before being hyperlinked from the registration site to FICO's Web site, the person's study ID is electronically transferred to FICO's site; the ID authenticates the person to FICO as a valid study participant who is also eligible for free reports and scores. Thus, an important purpose of the study ID is to ensure that the registration Web site, as well as the related site at FICO, is used only by solicited consumers.

Although procedures at *myFICO.com* are not covered by this PIA, they are presented for a fuller understanding of the steps in the study. In order to set up an account at FICO's Web site, a person (whether study participant or not), needs to enter the following: name, address, SSN, age, a login ID, a password, and also answer certain security questions before any credit reports are provided (e.g., latest mortgage payment, car payment, or similar such questions tailored to the consumer's credit report). Study participants have been told at the registration site that their login ID at FICO is their email address and that their password is the one pre-assigned at registration. Upon completion of this procedure participants may view their credit reports and scores on line for 35 days at no charge and may also download these reports.

In agreeing to the study, the consumer has given permission to the University researchers to draw their credit reports and to review them with the consumer.<sup>15</sup> A further purpose of the study ID is to enable University researchers to obtain (i.e., print) duplicate copies of the participant's credit reports and scores by entering their study ID and an administrative

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<sup>14</sup> Distinctions between participant access and public access are discussed below.

<sup>15</sup> This agreement is confirmed twice; first at the registration Web site (further discussed in Section 4.1) and then at FICO. As part of setting up a participant account at *myFICO.com*, there is a screen that again requests the consumer's consent to the terms of the study. The person responds by clicking either "I agree" or "I do not agree." If a person chooses "I do not agree," a new screen informs them that they are not eligible to receive free reports and scores through the study, and refers them back to FICO's home page.

password. This latter password, which pertains uniquely to the study, is created and administered by FICO. The purpose of the credit report and other data in the research database is to analyze the accuracy of such data and for reporting to Congress (without disclosure of individual data).

#### **2.4 How is the information collected?**

All information collected at the registration Web site is collected electronically through various screens at the site, and similarly so for information collected at *myFICO.com* in connection with the study. Some information in the research database is manually entered by the FTC's researchers (e.g., notes).

For consumers who do not have Internet access but wish to participate in the study, a special procedure is planned. The invitation letter provides a toll-free number that solicited consumers may call if they have questions. This call center is administered by University research associates, who can assist consumers with the registration process. If a solicited consumer has no Internet access, a research associate may complete the registration procedure over the telephone with the consumer's permission, inclusive of establishing their account at *myFICO.com*.<sup>16</sup> In view of the Internet's ubiquitous presence, we expect this special procedure would apply to at most a small minority of participants, if any.

#### **2.5 How will the information be checked for accuracy and timeliness (currency)?**

After the registration procedure and the consumer's receipt of their credit reports, a University researcher telephones the individual to review the credit report information and the contact information. If, at some subsequent point, individuals believe that their registration information is incorrect or out-of-date, they may simply communicate the new information to the FTC's research team at [busresc2@umsl.edu](mailto:busresc2@umsl.edu) or by calling the toll free number.

#### **2.6 Is the system using technologies in ways that the FTC has not previously employed (e.g., monitoring software, Smart Cards, etc.)? If so, how does the**

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<sup>16</sup> When a solicited consumer calls for assistance with registration, the associate will confirm that the person has received the FTC invitation letter (and ask for the study ID) and also confirm that the person has no Internet access (e.g., via a friend, neighbor, or public library). Upon confirmation, and with the consumer's permission, the associate would enter the contact information at the registration Web site on the consumer's behalf, and also enter the information required at FICO's Web site (described earlier). To confirm the consumer's permission for this enrollment, the individual would mail back a signed (prepared) consent form, where the latter is included in all FTC invitation letters. No credit report would be accessed until the associate has received the signed consent form. The consumer's SSN would be used once in setting up the account at *myFICO.com* and no record of the SSN would be kept.

**use of this technology affect individuals' privacy?**

The system does not use technology that has not been previously employed, save at one point: in contrast to the pilot studies, the national study will use an electronic transfer of a participant's study ID to FICO's portal, which will identify the person as having enrolled at the University's registration Web site (a study participant). This transfer is encrypted and poses no appreciable threat to a participant's privacy or information collected by the study.<sup>17</sup>

**2.7 What law or regulation permits the collection of this information?**

The Fair and Accurate Credit Transactions Act of 2003, which directs the FTC to do a study of credit report accuracy, permits the collection of information for the purpose of the study.

**2.8 Considering the type of information collected and sources of collection, what privacy risks were identified and how were these risks mitigated?**

This study involves a review of certain credit report information. As noted throughout, various procedures are in place to protect consumer privacy as much as possible, recognizing that the consumer has given permission for this review. An important mitigation of privacy risk is the fact that the study will not collect or review any sensitive personal identifying information.

As noted earlier, the registration Web site collects consumer contact information (name, address, telephone number, email address, best time to call), a study ID, and an assigned password. After credit reports have been drawn and printed<sup>18</sup> and reviewed with the consumer over the telephone, certain credit data (see earlier Section 2.1) are placed by University researchers in the *research database* after having removed all personal identifying information from that data, which is further partially redacted as described earlier. The resulting information is maintained and associated only with study ID. Also, the procedures and contractual obligations ensure that only the researchers who are assigned to interview consumers about their credit reports, and no other researchers (e.g., FTC staff assigned to the study or FICO staff who will re-score credit data), will know the personal identity of any participant. To further mitigate privacy risks, any communications about participant information between University researchers and FTC staff, or between University researchers and FICO staff, will occur only via study IDs.

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<sup>17</sup> Study IDs are transferred, one at a time, to FICO's portal after a person enrolls at the registration Web site. If any study ID were captured by an unwanted source, it would not be sufficient (see Section 2.3) to obtain any participant credit report information.

<sup>18</sup> As noted earlier, printed copies are stored in a locked filing cabinet, that is further located in a locked office.



Regarding credit report information that is downloaded from *myFICO.com*, this avenue is provided by *myFICO.com* to any consumer who has set up an account at that site.<sup>19</sup> The privacy risk associated with participants obtaining their credit report information in this study via *myFICO.com* is essentially the same as what may apply to any consumer who would use that site.<sup>20</sup> Consumers may visit *myFICO.com* to read the site's privacy policy and learn more about FICO's privacy and security procedures and practices.

As noted earlier, critical to the protection of consumer privacy and safeguarding the information collected by the FTC's researchers in this study is the separation between two types of data: individual registration data and credit report data. Each type is maintained in a separate, encrypted, and password-protected database. Access is granted only to those who need to use the information in the course of the study. There are also specific contractual obligations about the collection, storage, transmission, and disposal of all information pertaining to the study. The procedures regarding the collection, storage, transmission, and disposal of data have been designed to minimize the risk from illegal hacking, intrusion, or misuse of data. (See Section 6 (Security).)

### **3. Use and Access to Data in the System**

#### **3.1 Describe how information in the system will or may be used.**

Contact information collected by the registration Web site from study participants (name, address, telephone number, and email address) will be used to establish and maintain contact with participants in the study. The study ID is used by a person to enter the registration Web site and also (as one element) in establishing an account at *myFICO.com* to obtain credit reports and scores. The University researchers also use the study ID at FICO's Web site, along with an administrative password, to print a copy of participant credit reports in preparation for a review of the reports with the consumer. The study ID is thus used to relate a participant to his or her credit report information. The resulting credit data will be analyzed for accuracy and used by researchers in

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<sup>19</sup> The privacy and security of FICO's Web site is not covered by this PIA, since neither the FTC nor its researchers are using that site to collect or maintain information on individuals for the FTC. Nonetheless, the FTC notes that the information accessible on that site can only be viewed or downloaded; there is no avenue on that site by which researchers (or consumers) are permitted to change the information stored there by FICO. Consumers may seek to change their credit information through normal credit reporting procedures that affect any consumer's credit history, or through the FCRA dispute process, which allows a consumer to dispute his or her credit report information.

<sup>20</sup> For study participants, there is an electronic transfer of study ID (discussed above), the risk of which is being mitigated by security controls (e.g., encryption); also, participant date of birth will be suppressed when the credit reports are printed from the site, which further enhances privacy protection.

preparing the FTC's required report to Congress.

### **3.2 Which internal entities will have access to the information?**

The registration Web site data will be accessed by University researchers for the purposes described above and will not be transferred to the FTC or become part of any agency (or government) records. Likewise, Web site logs maintained by the University researchers will not be transferred to the FTC or made any part of FTC records.

The research database (discussed in Section 2.1) will be accessible by University researchers assigned to the study. Over the course of the study this information will also be shared with certain FTC staff (i.e., those assigned to the study) by means of participant study IDs. These shared data will thus be anonymous in nature; nonetheless, they will be electronically transferred in encrypted and password-protected files.

FICO will not be given access to participant contact information collected through the registration Web site, even though participants themselves will need to provide certain personal identifying information (described earlier) in order to establish an account at FICO's Web site to receive credit reports and scores. Further, FICO has no access (nor any need for access) to the research database.

### **3.3 Which external entities will have access to the information?**

There are no external entities that will have access to any of the information collected or maintained by the study, except for disclosures, if any, that may be required by law, e.g., subpoena or other legal process. Although the FTC's will use the data in the preparation of the report that the FTC is mandated to submit to Congress, the report will not include or disclose any individually identifiable data.

## **4. Notice and Access for Individuals**

### **4.1 How will individuals be informed about what information is collected, and how this information is used and disclosed?**

Participants receive several forms of notice before their consent to the collection of any information is requested. First, the FTC's invitation letter used to solicit consumers outlines the major steps of the study and provides a copy of the consumer consent form, which further highlights the type of information to be collected, how it would be used, and what the consumer agrees to in connection with the study. Further, the registration Web site, to which the consumer is directed via the letter, provides the FTC's privacy policy that is employed in the study. The policy is accessible by a hyperlink from the top bar placed at every screen of the site. The policy explains what information is collected by the site, why it is collected, how it will be used, how the information is secured, and other matters. Third, also at the registration Web site, the first three screens – which cannot be skipped by the consumer in moving through the site – provide a summary of

the study and various steps that a participant would agree to. All of this information is provided before the individual is requested to agree to the terms of the study or to give any contact information.

**4.2 Do individuals have the opportunity and/or right to decline to provide information?**

Participation is voluntary and anyone may decline to provide the requested information. Consumers are informed that if they decline to provide information that is needed for the study, then they cannot qualify to be participants.

**4.3 Do individuals have the right to consent to particular uses of the information? If so, how would an individual exercise this right?**

No. At the registration screen that requests the consumer's consent to the study, the consumer responds by clicking "I agree" or "I do not agree." Should a person forget to click one of these options, a special prompt is given and the person cannot proceed until this action is completed. For those who click "I agree," a new screen requests the contact information (discussed earlier).

**4.4 What are the procedures that allow individuals to gain access to their own information?**

As noted earlier, individuals who believe that their contact information is incorrect or out-of-date during the course of the study may simply communicate this to the FTC's research team at [busresc2@umsl.edu](mailto:busresc2@umsl.edu) (or, absent email, call a toll free number to talk to a research associate). Further, paper copies of participant credit reports (as described earlier) are mailed to participants by University researchers for the subsequent review of credit report accuracy over the telephone, but consumers will not have direct access to the research database maintained by the research team.<sup>21</sup> (See also Section 8 regarding Privacy Act procedures for requesting access to agency records, if any, containing an individual's data.)

**4.5 Discuss the privacy risks associated with the process of providing individuals access to their own records and how those risks are mitigated.**

Consumers do not have direct electronic access to their data in the registration Web site, except to enter registration data. (Likewise, as noted above, they have no direct electronic access to the credit report database containing their redacted credit report data, which is accessible only to researchers.) Regarding a person's access to the registration information that they have provided, the privacy risk is negligible. The consumer's

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<sup>21</sup> Although *myFICO.com* is not covered by this PIA, we note that a participant's account at *myFICO.com* permits participants to view their credit reports online for 35 days.

provided information consists of name, address, email address, phone number, and best time to call. If the latter were changed/captured by an unwanted person, it would not be sufficient to change or grant access to a participant's credit reports at FICO's Web site.<sup>22</sup> Further, regarding the mailed credit reports to a participant, these reports are redacted in the manner described earlier, which mitigates privacy risk regarding unwanted interception of this information.<sup>23</sup>

## 5 Web Site Privacy Issues

### 5.1 Describe any tracking technology used by the Web site and whether the technology is persistent or temporary (e.g., session cookie, persistent cookie, Web beacon). Currently, persistent tracking technology is not approved for use by the FTC (see 5.2).

The University server for the registration Web site collects (i.e., preserves) "log" information (e.g., IP address, date and time of visit) of individuals who visit the Web site. "Cookies" (i.e., small text files placed and stored on the user's computer by the Web site, which can be used to collect and maintain information about the user's activities on the Web site) are non-persistent; they are deleted automatically when the user closes the Web browser by which the information is collected.

### 5.2 If a persistent tracking technology is used, ensure that the proper issues are addressed (issues outlined in the FTC's PIA guide).

No persistent tracking technology is used.

### 5.3 If personal information is collected through a Web site, page, or online form accessible through the Internet, is appropriate encryption used? If not, explain.

All collected information is encrypted under *https* (a secure Internet protocol).

### 5.4 Explain how the public will be notified of the Privacy Policy.

The privacy policy is posted at the registration Web site; it is accessible by a hyperlink from the top bar at every screen of the site. It is machine readable (P3P-compliant).

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<sup>22</sup> As noted above, any consumer who requests credit reports at *myFICO.com* needs to enter the person's name, address, age, SSN, a login ID, a password (as well as answer certain security questions). As also explained earlier, neither SSN nor age is collected by this study.

<sup>23</sup> First class mail is normally used for credit reports that are mailed by national CRAs; first class mail is also used by the study contractor.

**5.5 Considering any Web site or Internet issues, please describe any privacy risks identified and how they have been mitigated.**

This matter is addressed in Sections 2.8 and 4.5.

**5.6 If the Web site will collect personal information from children under 13, or be directed at such children, explain how it will comply with the Children's Online Privacy Protection Act (COPPA).**

The Web site will solicit and collect information only from those who identify themselves as 21 years or older; thus, COPPA does not apply.

**6 Security of Information in the System**

**6.1 Are all IT security requirements and procedures required by federal law being followed to ensure that information is appropriately secured?**

Yes. The contractor warrants and agrees that it shall not use any non-FTC network or facility (e.g., commercial, corporate, university) to store or process Sensitive Information on behalf of the FTC, unless such network or facility is an information system currently certified and accredited under the Federal Information Security Management Act (FISMA), or such network or facility otherwise has adequate administrative, technical, physical and procedural controls, including a program of continuous monitoring to ensure such controls remain in place and fully operational, to ensure the security (i.e., confidentiality, integrity and availability) of Sensitive Information stored or processed for the FTC using such network or facility.

**6.2 Has a Certification & Accreditation been completed for the system or systems supporting the program?**

No. The registration Web site and the related screen at FICO's site that validates certain consumers as study participants (via the secure transfer of study IDs) are designed solely for the purpose of this study and their use will end within six months from the initiation of participant enrollment.

**6.3 Has a risk assessment been conducted on the system?**

A risk assessment in association with a Certification and Accreditation has not been completed. However, information security procedures to be used during this national study, covering both the registration and research database, were successfully tested and employed during the second pilot study of credit report

accuracy which involved its own PIA.<sup>24</sup> Interested parties may also consult FTC *December 2008 Report to Congress*, which reviews the procedures and findings of the second pilot study and is accessible at: <http://www.ftc.gov/opa/2008/12/factareport.shtm>).

**6.4 Does the project employ technology that may raise privacy concerns? If so, please discuss its implementation.**

Privacy concerns are not raised by the project's technology, which employs no unusual technology.

**6.5 What procedures are in place to determine which users may access the system and are they documented?**

Access to both the registration and research databases is granted on a need-to-know basis within the FTC and the Universities conducting this study. There are also specific and detailed policy and procedures attached to the contract concerning safeguards for all data collected during the course of this study.

**6.6 Describe what privacy training is provided to users either generally or specifically relevant to the program or system.**

The contract requires that privacy training be provided to all University researchers prior to their participation in the study. The contractor provided a description of the privacy training, and the FTC has determined that the course content is commensurate to the categorization of the data to be handled during the study. Additionally, the contractor shall verify the successful completion of the privacy training for all University researchers involved in this study.

**6.7 What auditing measures and technical safeguards are in place to prevent the misuse of data?**

The University has an Information Security Program, which is described at <http://infosec.missouri.edu>.<sup>25</sup> To the extent possible, the FTC has reviewed the documents available at this website. These documents describe policies which

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<sup>24</sup> *Registration Web Site for the FACTA Credit Report Accuracy Study—Privacy Impact Assessment (February 2008)*; it may be accessed at <http://ftc.gov/os/2008/02/08022pia.pdf>. In terms of technology, the main point of difference is that the national study will employ a secure electronic transfer of a study ID number, which identifies a person as a solicited consumer. No such electronic transfer was used in the second pilot study. For the rest, the technology and study procedures are the same.

<sup>25</sup> An audit of this security system was performed by Price Waterhouse three years ago.

are commensurate with the sensitivity level of the data being created, used, stored, and transmitted by the University.

**6.8 State that any questions regarding the security of the system should be directed to the FTC's Chief Information Security Officer.**

Any questions regarding the security of the system should be directed to the FTC's Chief Information Security Officer.

**7 Data Retention**

**7.1 For what period of time will data collected by this system be maintained?**

Data will be collected throughout the course of the study, which (by contract) is expected to run 66 weeks; the data would be maintained for this same period.

**7.2 What are the plans for destruction or disposal of the information?**

At the conclusion of the study, the FTC will require that the registration database, as well paper copies of credit reports and related notes, be destroyed; electronic data to be permanently deleted and data in paper form to be shredded. Credit data from the research database will be securely transferred to the FTC, and such data are anonymized, associated only with individual study IDs and no other personal identifiers. Further, the FTC's third party mailer, hired to send the invitation letters to consumers, will be instructed to destroy the mailing list when it is no longer needed. (All mailings are expected to be finished by six months from the initiation of the study; thereafter, the mailing list has no further use and it will be destroyed.)

**7.3 Describe any privacy risks identified in the data retention and disposal of the information, and describe how these risks have been mitigated.**

Any retention of data would occur only in de-identified form, so that such data cannot be tied to any individual. The data disposal methods to be used will not require transfer to or access by others that could present specific privacy risks. Importantly, the FTC never receives a copy of the registration database, which contains the consumer's contact information associated with their study IDs. Thus, the FTC will not have any ability to re-identify the participants, as the agency will not receive any information that could allow it to do so. Such re-identification is not necessary for this study. All analysis of the study will address only the anonymous and redacted data in the research database.

**8 Privacy Act**

**8.1 Will the data in the system be retrieved by a personal identifier?**

Yes. As noted above, contact information in the registration database is associated with study ID number, as well as a person's name and address. Study participants who believe that their contact information is incorrect or out-of-date can communicate new information to the research team (see Section 2.5). Likewise, credit data in the research database will be associated with and retrieved by individual study ID, where necessary.

**8.2 Is the system covered by an existing Privacy Act System of Records notice (SORN)?**

Although registration data and the credit report data can be retrieved by certain anonymized personal identifiers, the FTC is not taking custody and control of individuals' data in identifiable form. Nonetheless, to the extent that such records are deemed legally subject to the Privacy Act as agency records, those records would be covered by the SORN that applies to the agency's nonpublic legal program records (FTC I-1). <http://www.ftc.gov/foia/listofpaysystems.shtm> In addition, to the extent that the data are deemed to be system user data, the SORN covering such records (VII-3) would apply.

Moreover, the FTC's invitation letter and the registration Web site present appropriate privacy notices, consistent with the Privacy Act. This disclosure (notice) is the following.

*Privacy Act Statement.* Congress has directed the FTC to do this study, and The Fair and Accurate Credit Transactions Act of 2003 permits the collection of information from you for the purpose of this study. The FTC's researchers will be collecting this information, but the FTC does not intend to make any of your personal information part of its own records. To the extent that the Privacy Act of 1974 applies, your information would be treated as part of the agency's legal records system. You can read about routine uses of such records on the FTC's Web site (<http://www.ftc.gov/foia/sysnot/i-1.pdf> or <http://www.ftc.gov/foia/sysnot/i-1.wpd>). Your participation is completely voluntary, but please understand that if you choose not to provide information that we need for the study, then you cannot qualify to be a participant.

**9 Privacy Policy**



**9.1 Confirm that the collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC's privacy policy.**

The collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC's privacy policy.

**10 Approval and Signature Page**

Prepared for the Business Owners of the System by:

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## **FACTA 319 National Study on the Accuracy of Credit Bureau Information**

Research Performed for the United States Federal Trade Commission  
Under Contract FTC-10-H-0187

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## **FACTA 319 National Study on the Accuracy of Credit Bureau Information**

### **Executive Summary**

The FACTA 319 Study on the accuracy of credit bureau information is intended to:

1. Assess the accuracy of consumer information provided by the three largest credit reporting agencies (CRAs or credit bureaus)
2. Indicate the effects of alleged inaccuracies on the credit scores of individual consumers
3. Determine the changes that are made to the bureau files in response to formal disputes that are filed to address the alleged inaccuracies
4. Assess the effects of such revisions on the disputants' credit scores
5. Identify potential changes in the collection, dissemination and use of the data that would improve the accuracy and completeness of such information as used in qualifying individuals for credit and determining the terms under which credit is issued.

Using a research methodology proven effective in two previous pilot studies, researchers at the University of Missouri-St. Louis (UMSL), in collaboration with colleagues at the University of Arizona (UA) and Fair Isaac Corporation (FICO) engaged a nationally representative sample of consumers in an intensive review of their credit reports from each of the three major credit bureaus (Equifax, Experian and TransUnion). Strict protocols were employed to ensure that participants' personally identifying information was securely protected in all phases of the study.

When study participants alleged that items in their credit reports contained erroneous information, the research associates helped to clarify the changes to the credit record that would be required to rectify the alleged errors and they helped the participants prepare dispute paperwork to be filed with the relevant credit bureaus. Participants confirmed when they mailed the dispute paperwork to the appropriate credit bureaus. The university researchers, in cooperation with FICO scoring specialists, determined the impact of alleged errors upon the participants' credit scores by rescoring a frozen copy of the credit report after imposing changes to correct the alleged errors. Later, (a minimum of 56 days after the dispute letters were mailed to the bureaus), the researchers, through a specially designed FICO website, obtained new copies of the participants' credit reports to determine what changes were made to the record that would have resolved the consumers' disputes.

Results of each dispute were classified into three categories: (1) full changes to the significant elements of the credit-bureau file in agreement with the consumer's requests, (2) partial changes of disputed items in accord with the consumer's requests or (3) no changes to the credit-bureau file to satisfy the dispute. When the outcome was a partial change to the record involving the disputed items, and where the changes involved items that could affect the participant's FICO® score, a second rescoring of the frozen file was

performed as necessary to determine the effects of the changes that were actually imposed. (If the result was a complete set of changes as requested, the first rescore showed the impact: if the result was no change, the dispute had no impact on the participant's credit score). With this methodology, we are thus able to produce measures of both the frequency of errors and their severity as measured by the impact on a credit score.

### *Findings*

In-depth reviews of credit reports occurred with 1,003 individuals, and information was judged to be reliably obtained for 1,001 participants. There were:

- **263 cases** in which an alleged error met agreed criteria for a potentially material dispute (26%) (i.e., where the dispute involved a change that could potentially affect the credit score or provided evidence of data mismatches or identity theft)
  - 95 cases (36% of cases with potentially material disputes) where all the significant elements of disputed items were changed in accordance with the dispute letters filed by the consumer
  - 108 cases (41% of cases with potentially material disputes) where potentially significant disputed items were partly changed in accordance with the dispute letters filed by the consumer
  - 59 cases (22% of cases with potentially material disputes) in which no changes were imposed by the bureaus that satisfied the consumer's disputes
  - 1 case with no indication of outcome because no new reports were obtainable for that person (for technical reasons);
- **590 dispute letters** prepared for cases involving a potentially material error (an average of 2.24 letters for each participant with a potentially material dispute)
  - 194 disputes where the CRA made changes that satisfied all the potentially material items of concern in the dispute (in 194/590=33% of disputes)
  - 209 disputes where the CRA made some changes that addressed alleged errors as requested by the consumer (209/590=35% of disputes)
  - 187 disputes where the CRA made no changes that satisfied the consumer's concerns (187/590=32% of disputes);
- **1,619 credit-report items** (e.g., a credit-card account, mortgage, auto loan, collection account, inquiry for new credit, or public record) that were disputed as having erroneous information
  - 712 (44%) of report items challenged that were changed fully in a manner that satisfied the consumer's dispute
  - 133 (8%) of report items challenged that were changed partly in a manner that satisfied the consumer's dispute
  - 774 (48%) of report items challenged that were not changed to address the dispute.

Overall, the formal dispute process resulted in full or partial changes as requested for 203 consumers in the study. This represents 77% of the cases with alleged errors that were potentially material and 20% of all participants in the nationally representative sample.

Next we consider whether the changes had material effects on the participants' credit scores.

Considering the consumers who alleged errors in items that can have potentially material effects for which redrawing and rescoring was accomplished (considering the 263 cases with potentially material disputes), the impacts of actual changes made to the credit-bureau records upon the consumers' credit scores were:

- An average increase of 7.7 points in the minimum (lowest) credit score from the three bureaus
- An average increase of 6.1 points in the average of the credit scores from the three bureaus
- An average decrease of 3.5 points in the range of credit scores (difference between the highest and lowest credit score for an individual) from the three bureaus
- An increase of 10 or more points in a credit score from at least one of the three bureaus for 87 of the 263 cases (33%).
- Crossing of a standard lending threshold that determines terms of a loan in at least one of the bureau scores for 54 of the 263 cases (21%).

There were 210 cases with potentially material disputes for whom at least one bureau made a relevant change to the credit file following a dispute (including six consumers for whom the changes were not judged to have addressed the dispute in accordance with the consumer's request). The impacts of actual changes made to the credit-bureau records for these 210 consumers were:

- An average increase of 9.6 points in the minimum (lowest) credit score from the three bureaus
- An average increase of 7.7 points in the average of the credit scores from the three bureaus
- An average decrease of 3.5 points in the range of credit scores from the three bureaus
- An increase of 10 or more points in a credit score from at least one of the three bureaus for 87 of the 210 cases (41%)
- Crossing of a standard lending threshold that determines terms of a loan in at least one of the bureau scores for 54 of the 210 cases (26%).

There were 95 cases where all the disputed items were changed in accordance with the dispute letters filed by the consumer. For these 95 individuals, the impacts of actual changes made to the credit-bureau records upon their credit scores were:

- An average increase of 12.3 points in the minimum (lowest) credit score from the three bureaus
- An average increase of 8.2 points in the average of the credit scores from the three bureaus

- An average decrease of 7.4 points in the range of credit scores from the three bureaus
- An increase of 10 or more points in a credit score from at least one of the three bureaus for 33 of the 95 cases (35%)
- Crossing of a standard lending threshold that determines terms of a loan in at least one of the bureau scores for 22 of the 95 cases (23%).

There were 405 bureau disputes that resulted in at least one change to the bureau's record involving cases where at least one of the consumer's disputes was potentially material. For these 405 disputes:

- The median increase in the individual's credit score was zero (0), meaning that less than half of the outcomes for disputes with an individual bureau resulted in any increase in the credit score.
- The average increase in credit score was 11.8 points.
- 25% of the disputes resulted in a credit-score increase of 13 points or more.
- An increase of 10 points occurred in the credit score as a result of 32% of the disputes filed.
- A lending threshold was crossed as a result of an increased credit score in 16% of the disputes with a bureau.

In addition to assessing the frequency of errors and the effects of errors on individuals' credit scores, we examined whether bureaus took similar actions when a dispute of an item in a credit report occurred at more than one bureau. In all, there were 420 fundamental items in credit reports (such as a specific credit card, mortgage or public record) that were disputed with more than one bureau by the 263 consumers with a potentially material dispute (227 of them involving disputes with two bureaus and 193 involving disputes with all three bureaus). For 149 of the 227 specific items disputed at two bureaus (66% of such items), the two bureaus took similar actions. For 122 of the 193 specific items disputed at all three bureaus (63% of such items), all three bureaus took similar actions. For 62 of the 193 specific items disputed at all three bureaus (32% of such items), two of the three bureaus took similar actions. Often the difference in treatment from one bureau to another involved the removal of the disputed item at one bureau while another bureau either changed the corresponding item or left it unchanged.

It is difficult to isolate the effect upon a credit score due to an individual type of error in a consumer's credit report because errors tend to overlap. A single "account not mine", for example, can erroneously introduce an error in late payments, account balances, current delinquencies, and historical late payments. We can, however, indicate the overall changes in credit scores that occurred from all changes imposed on the consumer's credit records when some allegedly erroneous piece of information involved a particular type of error. Considering the frequency with which changes occurred to the credit records when errors of a particular type were present and the changes in the average of the consumer's credit scores when changes occurred, we observed that material disputes involving the reporting of payment behavior on revolving credit (such



as overdue amounts, late payments), collection activity, and accounts allegedly not belonging to the individual may have affected consumers the most.

There were 141 participants (14% of those in the sample) who claimed that at least one bureau erroneously reported negative information (overdue balances, late payments or charge-off) on some account. In 109 (77%) of those cases, some change was imposed to address an error and the average credit score for those consumers increased by 7.1 points. There were 97 consumers who reported “accounts not mine”. In 84 (87%) of those cases, some change was imposed to address an error and the average credit score for those consumers increased 8.4 points. There were 95 cases with disputes on items reported as sent to collection. In 81 (85%), of those cases, changes were imposed and the average credit score for those consumers increased by 8.3 points. The combination of these frequencies of occurrence of changes to the record and the average changes on credit scores when they occur following a dispute gives a crude indication of the significance of the various types of error on measurements of individuals’ creditworthiness. We must recognize, however, that the number of transactions that potentially give rise to different types of errors varies enormously and that significant accumulation of errors in the reporting of revolving credit can occur with extremely small error rates because the volume of such reports is extremely high.

### Qualitative Observations

As a complement to the statistical analysis of findings, we offer a few qualitative observations based on our engagement with the 1,003 study participants. The main areas of concern to consumers were allegedly erroneous reporting of late payments, the nature of reporting of collections and the reporting of inquiries for new credit.

In the course of the study, consumers expressed concerns that will be of interest to parties concerned with accurate recording and communication of credit information. The first concern pertained to reports of collection activity. Some consumers seemed to have difficulty in understanding the reporting of collections because items that were reported as tradelines of collection agencies did not generally identify the specific creditor or delinquent account that was involved. Other consumers felt helpless when they disputed the legitimacy of items or amounts sent to collection and yet saw no impact of the dispute on their credit scores after a note to that effect was added to the credit file. A note on the credit file that the collection is in dispute does not therefore seem necessarily to cause a collection action to be ignored in the computation of a credit score (nor, perhaps, should it).

Some collections for medical services were alleged to occur while there were questions about whether insurance should cover a charge or whether charges were properly assessed by a medical provider. In some such situations, collectors appeared to have neglected to report when individuals fully met their obligations and the record indicated that they were still burdened by discharged debt. There is no way that the bureaus can validate whether a collection is for a legitimate debt, but this begs questions of whether

it may be too easy for a party (such as a landlord) to report collection activity for questionable items and whether collectors are properly obligated to report when related debts are paid off.

The second concern related to the reporting and interpretation of inquiries for new credit. Several consumers alleged that “soft inquiries” or inquiries for new services or changes to contracts for mobile phone services appeared as if they were “hard pulls” by an individual seeking new credit and that such inquiries seemed to have a disproportionate effect on the person’s credit score. We also observed an ironic situation where the inquiry for and acquisition of new credit actually resulted in a reduction of the consumer’s debt burden (by paying off an existing loan with some cash and replacing the original loan with a new loan that had a lower interest rate and lower principal). Nevertheless, the person’s credit score was negatively affected despite the stronger credit position because inquiries for new credit and new credit obligations are generally associated with the assumption of higher credit risk. (Credit scores are based on cross-sectional comparisons of the most recent information in consumers’ credit files and do not contain specific information on ability to pay or how an individual’s file has changed from a previous point in time.)

The third concern was related to revolving credit utilization measures. As our research associates prepared for the interviews with the consumers, they compared key items in the credit reports for consistency and noticed the difficulty that one can encounter in estimating revolving-credit utilization. Revolving-credit utilization is stipulated in the industry’s educational material as an important element in computing a credit score; yet the sparse reporting of credit limits often makes credit utilization hard to estimate.

Overall, the study was completed according to plan. Participants regularly expressed high satisfaction with the study process, the education they received as participants in the study, and the care with which study protocols protected their privacy while allowing a thorough examination of their credit records. Following the dispute process, there was greater agreement, on average, in the credit scores across the three bureaus for the individuals who filed disputes.

The results of this study provide the FTC with objective measures of credit-report accuracy and objective measures of the potential effects of such inaccuracies. Our quantitative findings are supplemented with dispute narratives for each case that are provided under separate cover. We trust that the findings will meaningfully inform discussion of what more could or should be done to improve credit-report accuracy.

## **FACTA 319 National Study on the Accuracy of Credit Bureau Information**

### **1. Study Background and Purpose**

Section 319 of the Fair and Accurate Credit Transactions Act of 2003 (FACT Act or FACTA) requires the Federal Trade Commission (FTC) to study the accuracy and completeness of information in consumers' credit reports and to consider methods for improving the accuracy and completeness of such information. The FTC was required to issue a series of reports every two years to Congress beginning in December 2004, with the final report issued in 2014. The FACTA 319 Study on the accuracy of credit bureau information is intended to provide the FTC with objective information to fulfill this mandate.

Specifically, the purpose of the study is to engage a nationally representative sample of consumers to:

1. Assess the accuracy of consumer information provided by the three largest credit reporting agencies (CRAs or credit bureaus)
2. Indicate the effects of alleged inaccuracies on the credit scores of individual consumers
3. Determine the changes that are made to the bureau files in response to formal disputes that are filed clearly to address the alleged inaccuracies
4. Assess the effects of such revisions on the disputants' credit scores
5. Identify potential changes in the collection, dissemination and use of the data that would improve the accuracy and completeness of such information as used in qualifying individuals for credit and determining the terms under which credit is issued.

#### **1.1 Previous Studies on the Accuracy of Credit-Bureau Data**

Prior investigations of the accuracy of data in consumer credit files have produced highly disparate and contradictory results. The United States Public Interest Research Group (U.S.PIRG) conducted a series of studies in the 1990's regarding the accuracy of credit reports and reported that "79% of the credit reports surveyed contained either serious errors or other mistakes of some kind" and one-fourth of the reports surveyed "contained serious errors that could result in the denial of credit." (National Association of State PIRGs, 2004, p. 4). Their samples were not representative random samples; nor did the researchers attempt to validate the respondents' assertions about inaccuracies in the credit files.

Avery, et al. (2003) examined credit-report data from a large sample of randomly selected consumers and concluded that "close examination of credit reporting company data reveals that the information is not complete, may contain duplications, and at times contains ambiguities about the credit histories of at least some consumers." (pp. 70-71). In this study, the authors did not attempt to quantify the impacts of data issues on credit

scores, but suggest that the accuracy of estimated scores is likely to be adversely affected by such deficiencies.

In a subsequent study, Avery, et al. (2004) asserted that, while “the [credit reporting] agencies endeavor to maintain high-quality data and accurate files, the degree to which consumer credit reports are accurate, complete, timely, or consistent across agencies is in dispute.” They stated that “analysts disagree on the extent to which data errors and omissions affect credit history scores.” To shed light on this, they simulated errors of the type they observed and constructed a statistical model to assess the impact of the simulated errors on estimates of default risk. They concluded that “correcting the problems identified here is unlikely to substantially change the risk evaluation and access to credit for the typical individual.”

Lyons, et al. (2007) employed quantile regression to assess consumers’ credit knowledge and concluded that, while many of their respondents possessed some general knowledge of consumer credit scores and the reporting process, “many still lack specific knowledge about what information is contained in credit reports, how to dispute errors, and the possible impact of their credit history on such factors as insurance premiums and employment.” Using a large sample, Avery et al. (2004, p. 321) reverse-engineered credit scores and concluded that “when data are incomplete or in error, they often have little to no bearing on an individual’s credit history score or access to credit.”

Staten and Cate (2004) describe existing credit-reporting legislation as taking the “remedial approach” to regulation. The Fair Credit Reporting Act of 1996 (FCRA) provides consumers reasonably easy and economical access to credit-bureau data and an accessible mechanism for challenging information that they believe to be erroneous. As such, the FCRA “designates the consumer as the ‘quality-control’ inspector with the authority to mandate reinvestigation (and alert potential purchasers) of credit information when errors are detected. By doing so, it places the responsibility for monitoring file accuracy on the party who can determine accuracy at the lowest cost.” (p. 22) However, it is not evident that most consumers review their credit files and take actions to get errors corrected.

On these matters, the United States General Accounting Office (GAO) has concluded that “... the lack of comprehensive information regarding the accuracy of consumer credit reports inhibits any meaningful discussion of what more could or should be done to improve credit report accuracy.” (U.S. General Accounting Office, 2003, p. 17).

In an effort to fill this void, a recent study commissioned by the three major credit bureaus (Turner et al., 2011) used a study methodology similar in many respects to this study. The researchers engaged over 2,000 members of a consumer panel in a self-administered review of their credit records and the completion of a survey regarding the accuracy of the records and the results of any disputes filed to address apparent inaccuracies. The participants identified one or more disputed items in 19% of the reports reviewed but only half of those involved tradeline data or public records that could affect one’s credit score. Following the dispute process, changes imposed on the

record resulted in an increase of 10 or more points in the credit score for 59 of 286 disputed credit reports (21% of disputed reports). This, however, represented just 1.8% of all credit reports examined. The conclusion of the researchers was that the large volume of information naturally results in a relatively high percentage of credit records with one or more disputable items, but that the effects of errors on consumers' credit scores is not material in most cases. These researchers further examined the likelihood that the change in credit score would cross critical thresholds that determine eligibility for or cost of credit. An even smaller percentage of cases (as would be expected from this narrower definition) fell in this category.

In this study, we employ a tested research methodology on a random sample of consumers and use similar metrics for describing the results. Our findings will facilitate informed and objective discussion of the accuracy of credit-bureau information, the effects of alleged inaccuracies and corrective actions following disputes upon individuals' credit scores. It also yields some additional information about the workings of the process in place for resolving disputes with the CRAs.

## **2. Research Methodology and Study Protocols**

The study methodology was developed and refined in two pilot studies that were reported by the FTC in its 2006 and 2008 reports to Congress. It requires researchers to engage a representative sample of individual consumers in a comprehensive review of their credit reports to determine whether the information appears to be accurate. In cases where consumers allege that the information is inaccurate, research associates prepare letters for filing disputes and send them to the consumers, who complete the letters (adding their signatures, date of birth and Social Security numbers) and mail them to the appropriate credit bureaus. Participating consumers appear as standard customers to the CRAs, thus ensuring that no differential treatment is proffered to study participants. Research associates draw a second credit report at a later date to determine whether the requested changes were made to the credit-bureau files.

In instances where alleged errors meet an agreed standard of materiality (defined in Section 2.18 below), the researchers generate revised FICO® scores using the original (frozen) files with all the changes requested in the dispute letter applied to the file. The resulting changes in credit scores provide measures of the potential impact of alleged errors on the most widely used indicator of consumers' creditworthiness. In cases where the bureaus make partial changes to the record in accordance with the dispute letters, second re-scorings of the relevant frozen credit files are done to determine the impact of the changes that are actually imposed. The ultimate outcome of each dispute is categorized according to whether the credit record is (1) changed to address fully all nontrivial aspects of the dispute in accord with the consumer, (2) changed to address some aspects of the dispute in accord with the consumer, or (3) not changed to address the disputed information. The net effect of changes to the credit record is judged by the magnitudes of changes in the credit scores.

In the first Pilot Study, the team engaged 30 randomly selected consumers who obtained their credit reports and credit scores from each of the three leading credit reporting agencies (CRAs), Equifax, Experian and TransUnion. The consumers reviewed their reports with members of the research team and identified alleged inaccuracies. Consumers were then asked to send their challenges through the dispute resolution process with the appropriate CRA(s). The first Pilot Study confirmed the feasibility and effectiveness of the review methodology, which involved research associates' conducting an in-depth phone interview with the consumer to review the credit reports. It also revealed two major challenges for a national study. First, a more representative sample was required. Consumers with relatively low credit scores, compared with a national average, were under-represented. Second, the majority of consumers who identified alleged errors, and agreed to follow through the dispute resolution process, failed to do so. A second Pilot Study, conducted in 2007-2008 by the same study team addressed these issues.

In the second pilot study, 4,232 consumers were solicited through multiple recruiting channels in order to identify differences in response rates and credit scores. Of the 4,232 consumers contacted, 128 agreed to participate in the study. As in the first Pilot Study, study researchers helped the consumers obtain their three credit reports and credit scores and then conducted an in-depth review of the reports with the consumers by telephone. The researchers helped the consumer understand the difference between a small inaccuracy and a material error that might affect one's credit score. If the consumer identified a material error, the research team prepared dispute letters for the consumer and helped them through the dispute resolution process with the CRAs.

The second Pilot Study reconfirmed the feasibility of assessing accuracy in credit reports by engaging consumers in in-depth reviews of their credit reports, helping in the preparation of correspondence for registering disputes with the appropriate CRA, and following the results of the dispute resolution process by a successive draw of new credit reports after an appropriate time interval. It also confirmed the importance of having the study team prepare dispute letters for the consumer so that the requested changes to the credit record would be absolutely clear and the participant would be likely to follow through with the dispute. In the first Pilot Study, despite being informed about and asked to complete the dispute resolution process, only one of the three consumers who had alleged inaccuracies in their reports filed a dispute. In the second Pilot Study, when the research team prepared the dispute paperwork for the consumer, all 15 participants with disputes mailed their dispute letters to the relevant bureaus. The second Pilot Study, however, also reconfirmed the difficulty in securing participants with low credit scores (vs. those with scores above the national average) when solicitation is based on a purely random sampling process. In its conclusions, the research team suggested that a stratified random sampling would be required to generate a nationally representative sample with respect to the participants' credit scores.

In conducting this national study, the research team engaged 1,003 consumers that reflect national distributions of credit scores and major demographic characteristics. It used the same interviewing process that was employed in the first two Pilot Studies and the same

methodology for processing alleged inaccuracies in consumers' credit reports. A stratified random sample with a differential honorarium for participation was used in a mail solicitation to secure a properly representative sample. Next we provide details of the research design and the protocols employed in the research process.

## **2.1 Execution of the Research Process**

Invitations to participate in the study were issued by letters to a large sample of consumers selected from lists provided by each of the three major credit bureaus (Equifax, Experian and TransUnion). Registrations and electronic permissions were accomplished through a website at the University of Missouri-St. Louis (UMSL). After registration, participants were automatically forwarded to a special website at FICO where they were subjected to normal commercial authentication to ensure that the credit reports were being produced for the proper individual. The steps of the study from the time a person registers are as follows:

1. Upon registration, study participants are passed immediately from the FTC Study website to the FICO study portal, where the authentication process occurs for drawing credit reports and credit scores.
2. FICO saves a "frozen" set of credit reports that may be viewed by university research associates online and used for acquiring hard copies of the credit reports. The frozen files are also used by FICO to perform any rescoring that may be needed to assess the impact of alleged errors.
3. University research associates (RAs) print two sets of the credit reports from each of the bureaus. (FICO software suppressed account numbers to 3 or 4 digits and removed the participant's SSN and date of birth – thus ensuring that no sensitive personally identifying information was recorded or viewed by the university research associates.) One set of reports is mailed to the participant with interpretive material. The other set is used by the university investigators to prepare for the interview and manage the dispute process.
4. University RAs summarize essential information from their review of the credit reports in a spreadsheet that is used to guide the interview.
5. University RAs complete the in-depth reviews with the consumers in a telephone interview and note any alleged discrepancies.
6. If alleged discrepancies meet one of the "materiality standards" (see Section 2.18 below), the university RAs prepare paperwork (and stamped addressed envelopes) for filing disputes with the relevant bureaus.
7. RAs mail the dispute paperwork to the study participants with a postcard to be returned to the university (UMSL or UA) to report that the participants had appended their Social Security numbers and date of birth to the documents, signed them and mailed them to the bureaus.
8. Highlighted copies of disputed entries in the credit reports (if they have alleged errors that meet materiality standards and involve items that could affect the computed credit score) are sent with an accompanying memo to FICO that describes specifically how the record should be "corrected" to address the alleged errors. The materials are identified only by the FTC study ID, which is the key to the frozen

- credit-bureau files and to hardcopy records filed at the universities. Material sent between the universities in conjunction with rescoring is stripped of participants' identifying information (such as name and address or former names and addresses).
9. FICO reviews the changes that would be made to the frozen credit report to address each of the alleged errors and rescores the affected credit reports assuming that all the alleged errors are corrected as requested by the study participant in their letters to the credit bureaus.
  10. After a designated time interval (a minimum of 56 days to allow the dispute cycle to occur between the CRAs and creditors), university RAs draw new credit reports from bureaus with which disputes were registered to see what changes to the credit record had occurred. Consumers who had registered disputes that represent potentially material errors are informed by e-mail (if address is available) that their new reports are available for review. Others are informed by telephone about relevant changes that occurred in the credit record.
  11. In cases where partial changes occur to items that could affect the credit score, university RAs inform FICO of the changes and request a second rescoring to reflect the changes that were actually imposed. (No second rescoring is necessary if all changes were made, because the first rescoring would provide the proper result in such cases.)
  12. FICO reports the results of rescoring to the university RAs and maintains a cumulative record of all rescoring (with indications of specific changes made to the frozen files to generate the new scores).
  13. University investigators and research associates review the entire record and record results in the consumer case files and electronic databases constructed for the study.

We provide a flowchart of the overall research process in **Figure 1**. The numbers of cases that followed alternative paths through the process are also indicated in the flowchart.

## **2.12 Responsibilities, Training and Preparation of the Research Associates**

University research associates (RAs) worked directly with participants to help them understand the contents of the voluminous credit reports (often exceeding 60 pages across the three credit bureaus). They needed to understand and be able to explain how the headline summaries of items (such as credit utilization, length of history, public records, collection information, etc. as provided in the FICO® information document) can affect one's credit score and how they relate to the tradeline data and the detailed information from public records that are contained in the body of the printed report. They helped participants to clear up common misunderstandings about the information in their reports (thus enabling the consumer to distinguish between a misunderstanding and a potential error). This involved educating the study participants about the sources and uses of information in the bureau reports, the responsibilities of credit bureaus versus creditors, the lengths of times that negative items remain in the credit reports by law, and the potential effects of different items on credit scores.



**Figure 1 – Flowchart of the Study Process**

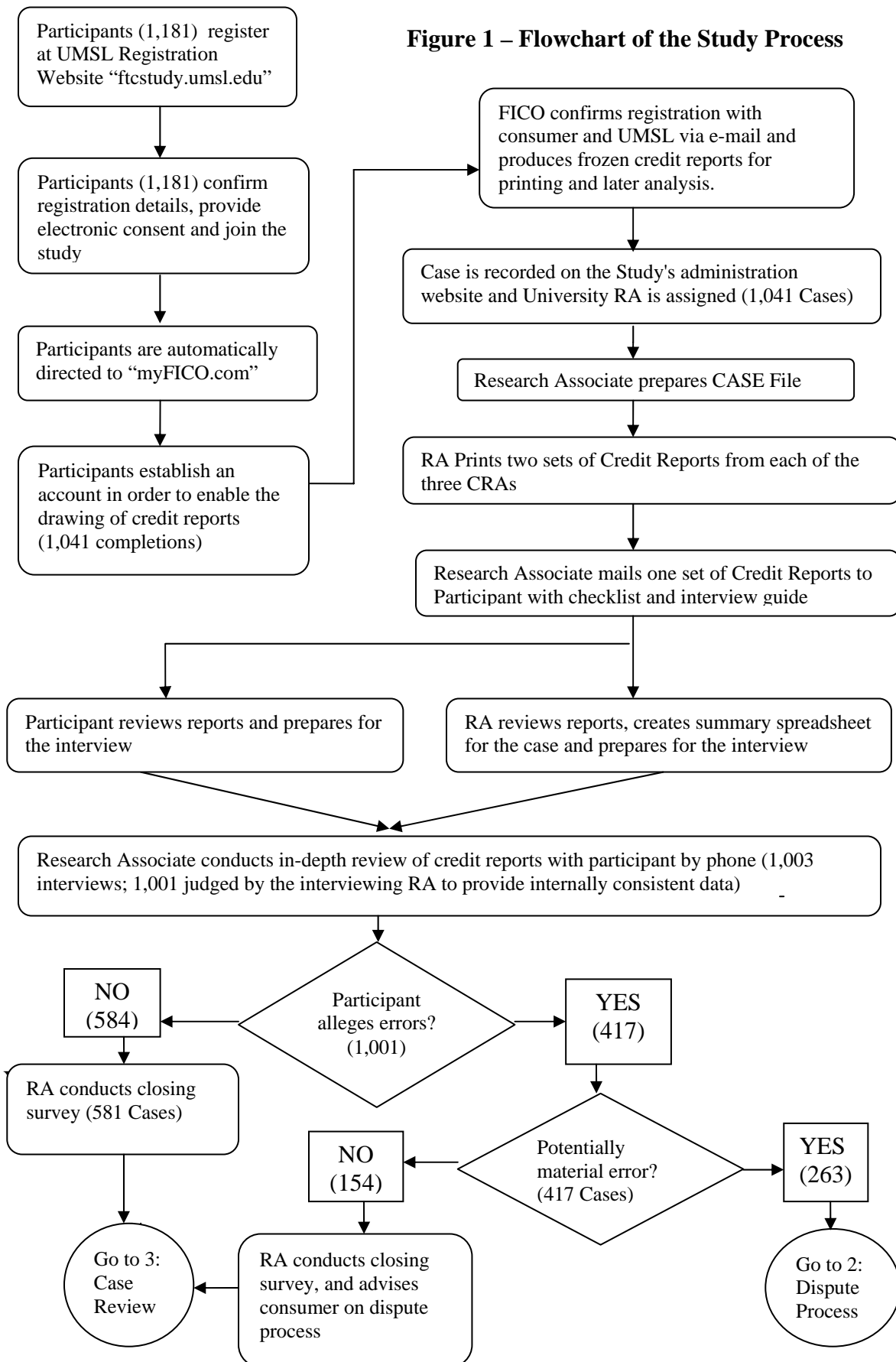
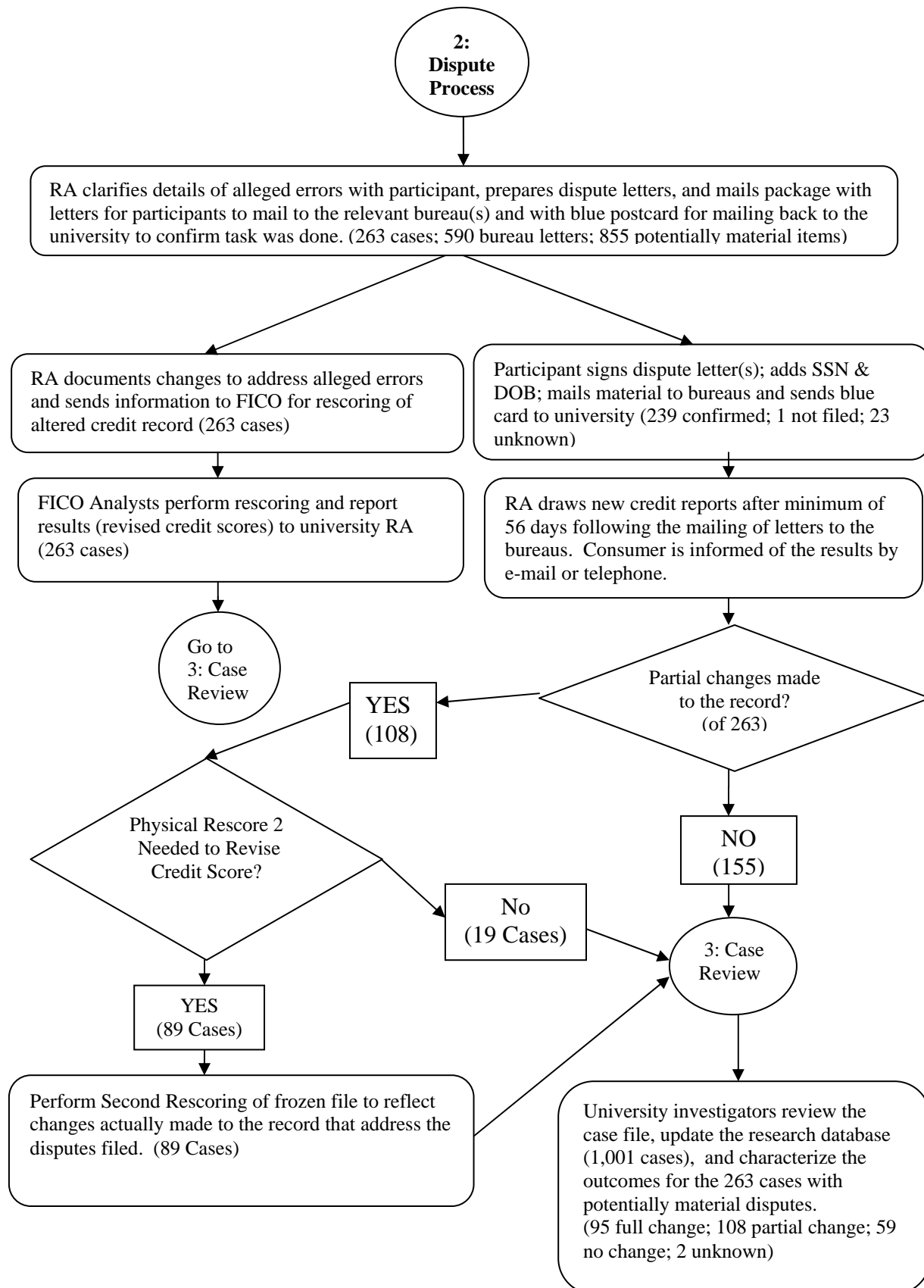


Figure 1 Continued



When a participant alleged that a reported item was inaccurate, the RAs explained the dispute process to the study participant, and assisted them in filing the dispute with sufficient clarity to address the alleged error properly. The RAs prepared letters that identified specifically what needed to be changed to correct the disputed records and sent a package to the consumer, who needed to add his or her Social Security number, date of birth, and signature before mailing the material to the credit bureau(s). In the terms of engagement, participants agreed to inform the study team about responses they received from the credit bureaus.

To perform effectively, Research Associates (RAs), including Senior Research Associates (SRAs), were therefore educated about the process of credit reporting, including the credit reporting industry and background; the legal framework surrounding FACTA 319; the process to be used when analyzing credit reports, criteria for judging whether an error is potentially material or not, what generally determines a FICO® Score (what helps or harms it); and the process of registering disputes with the CRAs. In addition, RAs and SRAs completed training in specific data security and privacy protocols in accordance with institutional research practices and Federal Trade Commission requirements.

Training in data security for the RAs consisted of:

- a) Online training and certification for privacy in human subjects' research.
- b) Personal instruction by faculty investigators and senior research associates in data protection protocols for the study (described in the contract).
- c) Personal instruction by Webinar re procedures for passing information among members of the research team – in particular, the preparation and transmission of de-identified extracts from credit reports for necessary rescoring.

The university investigators and professional staff from FICO conducted training seminars with study research associates (RAs and SRAs) to ensure that the study research associates:

- a) were thoroughly familiar with material in the credit reports;
- b) understood how items affect assessments of creditworthiness or expose risk of identity theft;
- c) employed proper research protocols and apply them consistently;
- d) were familiar with the Safeguards Rule (see Appendix 1);
- e) would protect participants' privacy and security of their personal information;
- f) would secure all records in accordance with the human subjects' protocols approved by the FTC and the UMSL and UA Institutional Research Boards;
- g) would render superior customer service and employ good telephone interviewing techniques;
- h) would properly follow all study procedures.

A training program was developed and, after Research Associates were hired, conducted throughout the next twelve months of the study. RAs signed confidentiality agreements (Appendix 2) that acknowledged their training and pledged adherence to protocols to protect the consumers' personal information and intellectual property shared in the course

of the study. The study manual provided to RAs for their training and as a reference throughout the study is provided under separate cover. It contains published material from multiple sources and material specific to the FACTA 319 national study. Material presented by FICO professionals in Webinar format (with speaker phones and projection of material at the university sites) is provided in Appendix 3.

### **2.13 Recruitment of Study Participants**

Recruitment of study participants was done by the FTC with the assistance of the three CRAs (Equifax, Experian and TransUnion), an independent mailing contractor, and weekly feedback from the research team about the characteristics of the individuals who had registered to date as participants in the study. The CRAs randomly selected approximately 200,000 credit files with sufficient information that would enable them to produce a Vantage credit score. The CRAs sent to the mailing contractor the master list of IDs and corresponding names and addresses. The CRAs provided the FTC with a list of these files (identified by a randomly generated ID that would serve as the identifier of all related records for the FTC study) with Vantage score, gender, age, and postal ZIP code of the consumer's current residence according to the credit-bureau file. The list was reduced randomly by the FTC to create a potential sampling frame of 174,617 consumers with proportional representation from each of the CRAs.

The FTC selected the IDs to whom the letters would be sent by stratified random sampling from the list of 174,617 potential participants and they informed the mailing contractor accordingly. The solicitation letters were imprinted with the study ID to enable the consumers to register at the UMSL registration website. The FTC was not informed of the names and addresses of potential or actual participants – either by the mailing contractor or the university investigators.

Letters were mailed to potential participants in a series of mailing waves that took place over 10 months. A week following the mailing of the letter on behalf of the FTC, the mailing contractor sent a follow-up letter from the director and PI of the research project with further information about the project team, encouragement to register at the UMSL registration website, and an offer of an alternative manual process for individuals without internet access. The universities learned the identities of individuals solicited for the study only when they were contacted by the individuals themselves. In other words, no other outreach occurred from the universities; nor did the mailing contractor communicate the names of solicited individuals to the universities. Appendix 4 contains templates for the solicitation letters sent by the mailing contractor on behalf of the FTC and the study research contractor.

#### **2.131 The Stratified Sampling Methodology to Acquire a Representative Sample**

From the Pilot studies, it was evident that more letters, on average, would be required to produce a registrant with a low credit score than a registrant with a high credit score. It was also harder, on average, to retain the involvement of people in the former category

throughout the dispute resolution process. The FTC therefore employed a differential (but nominal) honorarium to compensate individuals for participating in the study. Individuals with Vantage scores below the median were offered \$75 for their participation (in addition to the free credit reports with credit scores and the benefit of reviewing their reports with the help of the information provided by the university research associates). Individuals with Vantage scores above the median were offered \$25.

The FTC set targets for the number of participants in each 20-point Vantage score interval proportional to representation in the list of 174,617 case files in the sampling frame. Before each mailing wave, FTC economists examined the characteristics of registrants to date (Vantage scores, Census region, gender and age) and provided the mailing contractor with a list of IDs for the next mailing wave so that the expected number of respondents would result in a final distribution of Vantage scores that would match the targeted distribution as closely as possible. Secondary consideration was given to distributions according to geography (Census region), age and gender. The prime driver of the stratified sampling was thus a scale factor that was the inverse of the response rate for a Vantage-score category. Additional consideration was given to generating early registration of individuals with lower credit scores because more disputes were likely in that group and time is required at the end of the process to carry those cases to completion. The adaptive mailing process did an excellent job of creating a properly representative sample of participants.

## **2.14 The Registration Process**

The FTC's Invitation Letter and the follow-up letter from UMSL encouraged prospective participants to visit the secure website, [ftcstudy.umsl.edu](http://ftcstudy.umsl.edu) and register on-line. Additionally, the process required participants to establish (or renew) an account with FICO at their secure website, [www.myfico.com](http://www.myfico.com), in order for the participant and study researchers to retrieve credit reports and scores from the three CRAs. At the UMSL registration website, participants confirmed their eligibility and consent to the terms of the study. They agreed to allow the research associates from the study team at UMSL or the University of Arizona (UA) to print a copy of their three credit reports and mail them to the registered participant with a guide to help them prepare for an in depth review by phone. During registration, participants were asked to advise their preferred time for this phone interview and individuals were generally assigned to RAs who were scheduled to work in the corresponding times (weekdays in the day or evening or on weekends).

There was some concern as we designed the study that individuals without internet access may have different characteristics than those who could register online. We therefore made special provision to allow a senior research associate (SRA) to register persons without internet access after receiving signed written consent with the same terms of participation in the study. The SRAs went through the same websites on behalf of the participant – entering the authentication information at the FICO website on behalf of the participant with their permission, while making it clear that no written or computer record at the university was being created with the individual's personally identifying

information (SSN or date of birth) that was given over the phone. Ninety-nine (99) individuals were helped in this manner. All other registrations occurred by participants alone through the UMSL website – with concurrent telephone support as needed from university or FICO staff. The computer screens for the UMSL registration website and the FICO registration website are illustrated in Appendix 5.

### **2.15 Production and Mailing of Credit Reports**

A research study portal at FICO was created to allow the university RAs, SRAs and investigators access to the frozen credit files without knowing the SSN or date of birth (DOB) that had been removed for security purposes. The FTC Study ID was used instead to identify the relevant report. After drawing the credit reports, the RAs produced a package to be mailed to the study participant that included:

1. A copy of the consumer's credit report from each of the bureaus
2. A cover letter describing the contents, indicating the scheduled time for the telephone interview, and providing the toll-free contact number at which RAs could be reached to answer any questions
3. A checklist to be used by the participant in preparing for the telephone interview.

Samples of these materials are provided in Appendix 6.

### **2.16 Preparation for In-Depth Review of Credit Reports with Study Participants**

The university RAs thoroughly reviewed the information in each of the credit reports and organized it in spreadsheets designed to provide a comprehensive overview of the credit records at each of the bureaus while making it easy to see differences in the information provided. Included in the spreadsheets were summaries of key items that determine an individual's credit score such as:

- Number of active accounts
- Length of credit history
- Number of new accounts
- Number of accounts overdue
- Total outstanding balances
- Number of accounts with nonzero balances
- Number of accounts with negative items
- Number of accounts currently overdue
- Worst current delinquency
- Worst historical delinquency
- Number of times ever 30, 60 or 90+ days overdue
- Number of bankruptcy records
- Number of other public derogatory items
- Number of collections
- Amounts outstanding on collections

- Number and amounts of mortgages
- Number and amounts of home equity lines of credit
- Revolving balances and estimates of revolving credit utilization.

Apparent inconsistencies between the bureau records were noted for possible discussion. A sample of the preparatory spreadsheet is provided in Appendix 7.

### **2.17 The Telephone Interview to Review the Credit Reports**

An in-depth telephone interview (see guide in Appendix 8) was conducted with the participant to review the credit reports and to identify possible errors. Where discrepancies were alleged, participants were informed of whether there seemed to be some explanation elsewhere in the report or in the report from another bureau (as sometimes there is confusion about the company names associated with tradeline items, collections or credit inquiries) and whether the type of alleged error could have a significant impact on their credit scores (and therefore possibly affect their access to or cost of obtaining further credit). They were also alerted to whether an inaccuracy may affect actions from other uses of credit-bureau information (such as employment or insurance) or suggest a risk of identity theft.

If no inaccuracies were identified, the participant's involvement ended at this point. If inaccuracies were alleged, the RA clarified exactly how the consumer believed the record would appear if corrected (e.g., removing a single late payment or changing a balance on a collection account). In instances where the alleged error involved an item that could affect the consumer's credit score or presented evidence of potential mismatch of records or identity theft, the case entered the dispute phase for addressing potentially material errors. If the error was not classified as potentially material (such as a minor error in the spelling of a name or address), it was not necessary to file a dispute for the purposes of this study. For cases in which none of the alleged errors was potentially material, the RAs generally informed the participants how to communicate with the bureaus to have them corrected, and considered the process completed for that case. If, however, the participant requested help to handle the task, it was offered and the case record was marked as involving disputes that were not potentially material. If the RAs were in doubt about whether the materiality threshold had been met, they proceeded with the dispute process.

At the end of the telephone interview, the RA administered a brief closing survey (shown in Appendix 9) to obtain other information about the consumer that provides helpful context for the case, including the consumer's household, financial circumstances and credit experience, and adverse events (such as unemployment or serious illness). These were, of course, recorded anonymously but identifiable by FTC study ID to allow interpretation of the case with this contextual information.

## 2.18 The Dispute Process

Disputes were handled differently depending upon whether the disputed information could affect one's credit score. **Cases were considered to involve potentially material errors that called for rescoring of the frozen credit file if they contained:**

- An alleged error in the number of negative items, such as late or missed payments
- An alleged inaccurate number of public derogatories
- An alleged error in the number of accounts sent to collection
- An alleged error in the magnitude of an amounts that was subject to collection
- An alleged error in the number of inquiries for new credit (hard pulls on file)
- An alleged error in the total number of accounts with nonzero balances at any time in the reporting period
- An alleged error in the magnitude of an outstanding balance that is not attributable to normal monthly reporting variation
- Allegations of accounts on the Credit Report not belonging to (or cosigned by) the participant
- Dormant accounts shown as active and open if consumer had requested that the account be closed
- Duplicate entries of the same information such as late payments or outstanding obligations that were double counted in summaries of such information.

**Cases were considered to involve potentially material errors calling for disputes but not rescoring if they contained:**

- Evidence of possible identity theft (a separate judgment involving aforementioned items and other cues such as balances from unauthorized transactions on credit cards)
- Evidence of improper merging of information that does not apply to the participant (such as a previous address where the person has no connection)
- Errors in personal information such as current address or previous address
- Error in employment history (citing an employer for whom the participant had not worked).

Consumers were advised that filing a dispute could result in either an increase or decrease in the credit score, depending upon how the disputed information would be interpreted in the context of other information in the file. That may occur, for example, in situations where changing the record to address some concern may:

- Decrease the length of credit history in the file (as in removing an old but unused account)
- Increase a measure of credit utilization (as in removing an account with low current balance but high line of credit)
- Decrease the diversity of the credit mix.



In such cases, RAs were instructed to refer the participants to the FICO help desk to inquire about the implications of filing a dispute.

### **2.181 Preparation and Mailing of Letters that Address Disputes**

Disputes had to be filed with sufficient clarity for the bureaus and FICO to know how the record should be changed to address the inaccuracy. It is insufficient just to say that an item is wrong. For example, a 60-day late payment might have to be corrected to 30 days late. To ensure clarity, the RA prepared the letters on behalf of the consumers and then sent them to the consumers to provide the necessary identifying information (SSN and DOB) before signing and mailing the letters on to the credit bureaus. Stamped envelopes were provided to make the process as convenient as possible. Also enclosed in the dispute package was a stamped blue postcard that the consumers were to mail back to the university at the same time that they mailed the dispute letters to the credit bureaus. An example of correspondence sent for a dispute is provided in Appendix 10.

To give the bureaus sufficient time to communicate with creditors and process the disputes, we waited a minimum of eight weeks (56 days) after the consumers indicated that the disputes had been filed before drawing new credit reports to determine the outcome of the disputes.

### **2.182 Rescoring Frozen Credit Files for Cases with Potentially Material Errors**

In parallel to the dispute process with the credit bureaus, FICO performed a rescoring process to determine what the effects of the requested changes would have been upon the credit score for the disputed file. The RAs provided FICO with a copy of the sections of the credit report that needed to be changed and with written instructions about how the record should be changed to correct the alleged errors. The FTC study ID was used to match the materials with the frozen credit file. The steps below summarize the process used to complete rescoring requests by FICO and to communicate the results to the university team.

1. FICO receives a rescore request by e-mail from the university research assistants identifying the participant by FTC study ID and with the original credit score as a cross-check. Also received are details of the requested changes to be imposed on the record.
2. FICO pulls the proper file from the frozen file archives that were specifically created for the study and compares the resulting file to the information provided by the research assistant. The original FICO® Score and account activity are reviewed to verify the proper report had been identified.
3. Using the detailed information contained within the frozen file, a FICO analyst revises the file to impose the requested changes and calculates a revised FICO®

Score. The results of the rescore are documented on both the original request from the research assistant and in a summary spreadsheet maintained by FICO which also summarizes the changes that were imposed on the record.

4. The regenerated FICO® Score with a brief description of the reason for the resulting impact on the credit score is communicated to the university RA by sending an update on the request form. The spreadsheet summarizing all requested rescoring and their description is periodically reviewed and provided to the university investigators.

### **2.183 Redrawing Credit Reports to Identify Outcomes of the Dispute Process**

Study participants, in their formal consent at the beginning of the study, authorized the research team to draw a second set of credit reports at a later time to investigate what changes were imposed on the credit records as a result of disputes filed. FICO created an option at the research portal that enabled the university researchers to draw new credit reports by entering the FTC study ID. When this occurred, e-mail notices were sent automatically by FICO to the study participants, informing them that they could view their new credit reports online. At the same time, the university RAs received notice that the new reports were available for printing from the frozen file archives. The new reports were printed and placed in the case file.

For each of the entries disputed, the RAs compared the new credit reports with the originals and identified whether the result was:

1. A change to the credit file that fully addressed the requested changes involving that item (e.g., a tradeline entry or public record) in accord with the consumer
2. A change to the record that partly addressed the request in accord with the consumer (e.g., changing some elements of a disputed record that would correct an alleged error but not others)
3. No change to the record.

This can get quite complicated, as a monthly report for an individual tradeline, for example, contains information about the length of history for the account, historical late payments (prior to the current month) and current account status (balances and past due information) and that information is usually available in three credit reports. Therefore, we recorded, for each case, indications of whether changes involved full, partial or no changes to disputed items:

- For the set of all disputes filed by the consumer (i.e., with the case as the unit of analysis)
- For the set of all disputes filed by the consumer with a particular bureau (i.e., with the consumer's credit file at a single bureau as the unit of analysis)

We also counted the number of items disputed with each bureau and the number of items at the bureau which were changed fully, partially or not at all. We did not, however, separately record the disposition for each error associated with an individual item (i.e., tradeline, public record or collection action) at each bureau because the number of combinations of possible outcomes explodes when analyzed at that level of detail. Different elements of a disputed item may be involved with the dispute at one bureau versus another. For example, the balance reported on a tradeline may be in dispute with one bureau while the past due status for the same tradeline may be in dispute with another bureau. In later analysis (to be discussed in Section 3.5), however, we report whether bureaus altered or removed specific items that were disputed and whether they took the same actions when the same item was disputed.

After analyzing the differences between information in the new credit reports and information in the original credit reports, the RAs communicated the findings to study participants by e-mail or telephone call. In cases where no changes or partial changes occurred to the record, they also attempted to reach the consumers by e-mail and telephone to reconfirm that the dispute letters were sent exactly as prepared by the university RAs and to inquire what communication they had received from the bureaus to explain the results of their investigation.

### **2.184 Second Rescoring of Frozen Credit Files to Assess the Impact of Partial Corrections to a Credit File**

In cases where no changes occur to the record related to the dispute filed, there is no effect on credit score. In cases where all changes are imposed in accord with the consumer, the credit score that emerges from the initial rescoring process may be used to assess the magnitude of the effect of the changes. In cases where just some changes are imposed (i.e., partial changes to the file), the file may need to be rescored a second time to reflect the actual changes. In such instances, the university investigators noted whether the elements that were actually changed could potentially have affected the credit score (using the same considerations as related in Section 2.18). If they could have affected the credit score, the rescoring process was repeated as necessary and the results were recorded.

## **2.2 The Research Database**

Information from the review of credit reports, the closing survey, the rescoring process and redrawing of credit reports was placed in a SAS (Statistical Analysis System) dataset that has a single record for each case (study participant) for convenient retrieval and statistical analysis. The FTC study ID serves as the identifier of the case. The elements (variables) of the SAS database and their descriptive labels are provided in Appendix 11. A Data Dictionary with further information about the coding of alternative responses in the telephone interview is provided in a separate attachment entitled **FACTA319datadictionary.xls**. Further information about the rescoring process and

results of first and second rescoring are summarized in an Excel spreadsheet (Rescore Report). This is provided in a separate attachment entitled **rescoredata.xls**.

A comprehensive summary of each case with a potentially material error is provided as a dispute narrative in a separate document. The dispute narratives include original credit scores derived from the (frozen) files reviewed by the consumer, descriptions of the alleged errors, results of any rescoring and findings from the review of new credit reports acquired to determine the changes that were imposed related to the disputes that were filed. Also included are the new credit scores in the second set of credit reports and the researchers' notes about whether the outcomes validate the disputes filed by the consumer. If the investigators observed a material difference in the handling of a dispute that was registered similarly at more than one bureau, they noted this in the dispute narrative. Key information from the dispute narratives were placed in the SAS research database as well.

### **3. Statistical Results**

We provide the statistical results in two sets of tables. The first set of tables, provided in Appendix 12, provides the statistics used to check the characteristics of the sample against information that was available from the credit bureaus to adjust the mailing lists in pursuit of a representative set of participants. The second set of statistics contains information obtained from the registration process, credit reports drawn for study participants, the telephone review of credit reports, communications during the dispute process, the closing survey, and other clarifying written and verbal communication with study participants. The study statistics are provided in Appendix 13.

#### **3.1 Representative Nature of the Sample**

In Appendix 12, successive columns of Table FNON1 provide the numbers and percentages of individuals in the five Vantage-score quintile groupings for:

- 146,402 individuals in the entire sampling frame of 174,617 who were not sent letters inviting them to participate
- 27,175 individuals who were invited to register but who did not complete the registration process
- 38 individuals to whom credit reports were mailed but who failed to complete the review of their credit reports with an RA
- 1,002 individuals with whom the review of credit reports was completed and for whom we had a matching Vantage score (A single individual was registered with a manufactured ID because of a technical problem and we could not match the person with the sampling frame.)
- All 174,617 individuals in the sampling frame.

The primary goal in the generation of the sample from the sampling frame was to achieve equal representation of individuals from each credit-score grouping – which would result in a close match of the percentages for the frequency distributions in the last two columns

of Table FNON1. As mentioned earlier, the stratified sampling approach with feedback to adjust the composition of successive mailings (10 in all) resulted in an excellent distribution. There is a very slight underrepresentation of individuals with low credit scores (19% versus 20% with a Vantage score below 616). The relative difficulty of engaging individuals with low credit scores throughout the process is illustrated by the distribution of credit scores with whom an interview could not be completed after the credit reports were mailed to them. Of the 38 persons with whom the interview could not be completed, 55% were in the grouping with lowest credit scores versus 20% in the sampling frame.

Comparisons on age and gender as derived from credit-bureau records can be made with the statistics in Tables FNON2 and FNON3. There appeared to be a slightly higher tendency of individuals in the youngest age category to participate. Twenty percent (20%) of participants were younger than 30 years of age versus 16% in the sampling frame. People in the oldest age group were correspondingly less inclined to participate. Twenty-one percent (21%) of participants were over 60 years of age versus 25% in the sampling frame. Men were slightly more inclined to participate than women (composing just over 50% of the sample), but they were also more likely not to complete the process after registering.

Over all, there is excellent representation in the sample of completed interviews according to the primary criterion (credit score), good representation from all age groups, and an excellent mix according to gender.

After the mailings were complete, the FTC obtained additional items of information regarding the credit history of individuals who were invited to participate in the study (identified only by the abstract study ID) so that they could study further the representative characteristics of the final sample. From those, we selected two key measures: the months of credit history and the number of credit lines with late payments indicated as of February 15, 2011. In Tables FNON4 and FNON 5, we compare the distributions of these two variables for invitees with the distributions for ultimate participants. Recall, however, that the stratified random sampling process to achieve a balanced sample overall, was geared to adjust for the expectation that a higher percentage of registrants (from those who received the invitation) would have strong credit histories. Thus a higher percentage of invitees than registrants have shorter credit histories and more late payments.

Table FNON6 verifies that there were participants from each of the 50 states. The size of the sample from each state is generally related to the size of the adult population.

### **3.2 Characteristics of the Study Participants**

Characteristics of the study participants are presented in the first 35 tables of Appendix 13. This information was obtained from the closing survey following the completion of the review of credit reports. We shall discuss the statistics for participants overall and

also mention how they vary among five groups of participants determined by the average of their FICO® scores in comparison to FICO®-score quintiles. Care must be taken when comparing the distributions of personal characteristics of study participants against data from other published sources because most published statistics are not geared to our sampling frame (individuals whose credit history is sufficient to allow the CRAs to generate a credit score). We should also emphasize that many of the characteristics mentioned below are ignored when computing a FICO® score. FICO® scores, for example, do not consider race, color, religion, national origin, gender, marital status, age, salary, occupation, or employment history.

As seen in Table 1, 51% of participants were male and 49% were female overall. Individuals in the highest credit score grouping were more likely to be male (56%). In the two lowest credit-score groupings, 56% were female.

Age distributions of participants are provided in Table 2. Approximately 20% of the participants were in each of the age categories (under 30, the 30's, the 40's, the 50's and over 60). As expected, there is a strong relationship between age and credit score. In the highest credit score group 44% are over 60 years of age and 3% are under 30. In the lowest credit score group, only 8% are over 60 and 27% are under 30 years of age.

Groupings according to race or ethnicity are presented in Table 3. Race or ethnicity was not defined with the precision required for a Census of the U.S. population. We did not take pains to clarify whether the individual responded with reference to skin color, ancestral heritage, birthplace, country of origin, language or accent when speaking. We also recognized that a category such as Asian could represent a wide range of cultural, physical and sociological backgrounds. Race or ethnicity is not an element in a credit report. Our motive in asking the question was to identify groups of the population that may not be proportionately represented in the study and to provide information that may be used, if necessary, to weight statistics when producing aggregate measures of the frequency and impact of alleged errors in credit scores.

We therefore simply asked if the participant would classify himself as:

1. White
2. African American (or Black)
3. Hispanic (or Latino)
4. Asian
5. Other.

Overall, 76% of participants classified themselves as White; 13.4% as African American (or Black); 4.1% as Hispanic or Latino; 3.8% as Asian and 2.8% as Other.

The ethnic grouping did reveal substantial differences with respect to credit history. Among those in the highest credit-score grouping, 95% classified themselves as white and just 1% classified themselves as African American. Among those in the lowest group, 48% classified themselves as white and 40% classified themselves as Black or African American. Generally, White participants were more likely to be in the higher

credit-score groupings; African American (or Black) participants, and to a lesser extent Hispanic (or Latino) participants were more likely to be in the lower groupings. Asians tended to be above the median and not at the extremes, in terms of credit-score groupings. Others tended to be below the median and not at the extremes.

When we presented these statistics to the FTC, we were advised that current OMB standards on classification of race and ethnicity for federal reports attempt to treat race and ethnicity as if they are mutually independent. In particular, individuals are to be asked to classify themselves as: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, or White. After responding to race, survey respondents should then be asked a separate question on ethnicity with the categories: "Hispanic or Latino" and "Not Hispanic or Latino." ([http://www.whitehouse.gov/omb/fedreg\\_1997standards](http://www.whitehouse.gov/omb/fedreg_1997standards)). Some of these individual categories may be grouped with "Other" if small sample sizes would cause the finer distinctions to be meaningless. To report in conformity with this directive, we communicated by e-mail and telephone with each of the 41 respondents who had classified themselves as "Hispanic or Latino" and we asked if they considered themselves to be (1) white, (2) black or African American, (4) Asian or (5) Other. Of these 41 individuals, 32 responded; 17 classified themselves as white; 14 classified themselves as other, one (1) as Asian. Treating the nine (9) nonrespondents as missing data (and therefore not counted), we generated Table 3B according to race. Further delineation as Hispanic versus non-Hispanic was not undertaken, as the numbers were too small to draw meaningful inferences.

In Table 4, one may see that 54% of the participants classified themselves as married; 22% as never married; 13% as divorced 7% as living with a partner; 2% widowed and 2% separated. A tendency was evident for people who are married to have the highest credit scores while divorced individuals and never married are more likely to have lower credit scores. We should mention, however, that persons never married tended to be younger and that the latter characteristic (and shorter credit history) may account for the difference along this dimension.

Educational attainment is presented in Table 5. Of the study participants, 26% had graduate degrees and 30% had undergraduate degrees. Higher education tended to be more prevalent in the highest credit-score group and less prevalent in the lowest credit-score group. It appears that our sample may have a higher percentage of college-educated individuals than in the U.S. population.

Overall, 63% of participants were homeowners (Table 6) and home ownership was associated with higher credit scores. Median household size was 2 but 8% of households had 5 or more individuals (Table 7). There was some tendency for two-person households to have the highest credit scores.

In Table 8, we see that 69% of respondents were from households with no children under 18 year of age living at home; 14 % had one person under 18 in the household; 13% had

two. There was some tendency for individuals with no persons under 18 in the household to have relatively higher credit scores.

Of the participants, 69% were employed (Table 9). Employed individuals with longer employment history tended to have higher credit scores (Table 10). Eighty-two percent (82%) of employed participants worked full-time. Full-time status was not at all predictive of credit-score grouping (Table 11); nor was the employment category (Table 12). People classified as professionals tended to be in the higher credit-score groupings (Table 13).

Distributions of participants among income categories suggest that our sample may be somewhat more affluent than the U.S. average (Table 14). The median reported household income was in the \$50K-\$75K category and 24% of participants reported a household income over \$100K. As expected, higher incomes were associated with higher credit scores – with a noticeable transition in credit risk at about \$50K (according to FICO score distributions).

Moving now from the traditional demographic breakdowns, we report the answers to questions about participants' self-assessed knowledge of credit matters, their use of credit, recent life events that can affect one's financial capacity, and resources for retirement. On a scale from one (low) to five (high), the majority of participants rated themselves as 4 or 5 with respect to knowledge of credit matters (Table 15) and ability to manage their own finances (Table 16) – with the expected positive relationship between those ratings and credit-score.

Twenty-three percent (23%) of participants reported that they had taken a personal finance course in high school or college (Table 17) and with no beneficial effects evident from the credit-score category in which they fell. This begs the question of whether younger people may have been more likely to have taken such a course – something for further investigation and analysis.

Sixty-eight percent (68%) of participants had previously requested their credit reports for their own review (Table 18). The percentage did not vary systematically among credit-score groupings. Of 778 respondents to the question of whether they had previously disputed inaccurate information in a credit report, 25% claimed to have done so. To assess whether this may have affected reports of accuracy and dispute outcomes in this study, we are providing a separate set of statistics (under separate cover) in which we eliminate the data for those who have formerly disputed credit-bureau data. Overall, 40% of respondents claimed to have previously received their credit scores from some source (Table 20) and with a higher percentage in the middle credit-score categories having done so (perhaps in successfully seeking credit).

Only 3% claimed to have received credit in the past seven years that is not reflected in their credit reports (Table 21). Thirty-five percent (35%) of those individuals had paid off those obligations (Table 22).



Eighty-five percent (85%) of respondents reported that they generally pay more than the minimum balance due on their credit cards (Table 23), but only 49% claim to pay off all credit card balances monthly (Table 24) – a practice that is clearly associated with higher credit scores. Eighty-seven percent (87%) of individuals in the highest credit score group said they do so; 89% in the lowest credit score group said they do not.

Eleven percent (11%) of participants overall had credit limits lowered in the past year (Table 25); 17% in the lowest credit-score group had experienced this, in comparison with 6% in the highest group. Six percent (6%) of participants overall had used alternative credit sources such as payday loans or pawn shops, while 20% in the lowest credit-score group had done so (Table 26). Forty percent of those individuals claimed to have done so to avoid higher interest costs or service fees at traditional lending institutions such as banks (Table 27).

Twenty-two percent (22%) of respondents had been unemployed for three or more months in the past few years (Table 28), and the prevalence was expectedly higher among people in the lowest credit-score group (44% for individuals in the lowest grouping and 8% for those in the highest grouping).

Thirty-eight percent (38%) of participants had experienced a significant drop in household income in the past two years (Table 29). This was true for 21% of individuals in the highest credit-score category and for 63% in the lowest category.

Other major life events are highly associated with credit-score grouping. A birth had occurred in the families of 10% of participants (Table 30) and more frequently among individuals (17%) in the lowest credit-score category. Divorce, separation or death of a spouse had been experienced by 7% of participants in the past two years (Table 31), with much higher incidence among those with lowest credit scores (13%) than among those with highest credit scores (1%). Overall, 17% had received a major medical bill that was not covered by insurance (Table 32) and this had occurred for 30% of individuals in the lowest credit-score group but only 8% of those in the highest credit-score group.

As might be expected, access to financial reserves and retirement savings are highly related to credit-score group. Overall, 70% of participants reported having a \$2,000 contingency fund for emergencies (Table 33) – 95% in the highest credit-score group and 29% in the lowest credit-score group. Overall, 60% had some form of employer-provided retirement plan (70% in the highest group and 43% in the lowest). Thirty-eight (38%) had another type of retirement savings plan such as an IRA (Table 35) – 69% in the highest group but only 8% in the lowest group.

These simple tabulations point to a complex set of inter-related factors involving personal characteristics, family characteristics, and major life events that all affect use of credit and discharge of financial obligations. They inevitably affect the composition of a sample and can cause many statistical results to be interrelated. Further analysis of the data with multivariate techniques may reveal more about the interrelationships.

### 3.3 Frequencies of Alleged Errors

We start our study of the frequencies with which errors may exist in the credit-bureau data by identifying whether, on any of the three credit reports, there is an alleged error in:

- Current name and address (other than a minor spelling error)
- Previous names and addresses
- Current or former employers
- The number of open accounts (including "not mine")
- The number of accounts with nonzero balances
- A current mortgage balance
- The number of accounts with negative items (late payments or indication of collection action, charge-off or settlement in bankruptcy)
- A public record of bankruptcy
- Another public derogatory
- Total outstanding balance on all accounts
- The amount of a home equity credit line (HELOC)
- The current balance on home equity lines of credit
- The total balance on revolving credit
- Reported utilization of revolving credit
- The number of collections
- Balance owing on collections
- Inquiries for credit in the past 12 months.

Note that a single entry (item) in a credit report could introduce several types of error. The presence of an account (tradeline) not belonging to the person with a substantial balance that is overdue could, for example, affect many of the aforementioned indicators. If information about the account were disputed with a single CRA, it would count as a single item disputed.

In our first count of alleged errors, we do not consider whether they could have a significant effect on the participant's eligibility for credit or the cost of credit. Later, we concentrate on the cases that involve potentially material disputes. We attempted, however, to ignore items that, while wrong, would be interpreted correctly in any reasonable reading of the report (such as a trivially misspelled name with a correct address or the correct name with a street name expressed as Avenue rather than Street). We also asked the participant not to consider a balance wrong if it could have occurred at any time during the billing cycle.

Table 36 reveals that one of these types of error allegedly occurred in 42% of the cases reviewed (in 60% of cases for individuals in the lowest credit-score group and 20% of cases in the highest credit-score group). Two or more alleged errors were identified by

25% of the participants. These statistics may be surprisingly high but not quite so alarming when one considers the enormous number of bits of information from many sources covering a seven-year period that appear in three credit bureau files. They do, however, underscore the need to explore further whether all the alleged errors, if corrected for a participant, would have a significant effect on the individual's credit score(s).

As stated in the introduction to the study, we classify an alleged error as “potentially material” if it involves any of the following key components of the credit score or other serious misrepresentations of the person's credit history or personal history:

- the number of negative items, such as late or missed payments
- the number of public derogatories
- the number of accounts sent to collection
- the magnitude of an amounts that was subject to collection
- the number of inquiries for new credit (reported as hard pulls on file)
- the total number of accounts with nonzero balances at any time in the reporting period
- the magnitude of an outstanding balance that is not attributable to normal monthly reporting variation
- accounts on the Credit Report not belonging to (or cosigned by) the participant
- dormant accounts shown as active and open if consumer had requested that the account be closed
- duplicate entries of the same information such as late payments or outstanding obligations that were double counted in summaries of such information
- evidence of improper merging of information that does not apply to the participant (such as a previous address where the person has no connection)
- personal information such as current address or previous address
- employment history (citing an employer for whom the participant had not worked).
- public records such as collections or bankruptcy.

Table 37 enumerates the number of cases where there was an allegation of a potentially material error in one of the three bureau reports. This occurred in 26% of the cases overall, and with frequencies ranging from 5% for people in the highest credit-score group to 45% for people in the lowest credit-score group. For each of the 263 cases with potentially material disputes, we prepared letters for the participant to mail to the bureaus (Table 38). Not all cases with allegations of potentially material disputes resulted in the transmission of a letter to the credit bureaus. One participant did not want to be bothered with the dispute process because he had strong credit scores and the disputed item was an inquiry that was soon to roll off the report anyway. Another intended to file a dispute but reconsidered. The case for the latter individual was classified as not having a potentially material error. In the following analysis, we are careful to indicate the basis of the statistic being presented (e.g., all individuals who confirmed that they had mailed a dispute letter).

There were 239 cases where we received confirmation from the participant that the materials were mailed to the bureaus exactly as prepared (Table 39). One individual confirmed that he did not file a dispute. Twenty-three (23) individuals could not be reached to confirm that they had mailed the dispute letters despite multiple attempts. Most of those individuals had low credit scores. To complete the record of outcomes for those cases, we drew new credit reports even though we did not receive confirmation that the dispute letters were ultimately mailed.

### 3.4 Dispute Outcomes

Table 40 summarizes the status of all 263 cases with potentially material disputes alleged during the review of credit reports. At least one credit report was able to be redrawn for all but one (1) of the cases, but there were thirteen (13) cases where at least one report was unable to be redrawn because of technical difficulties related to re-authentication required for the participant or because the disputed file had become “unscorable”. In sum, there were:

- 263 cases in which an alleged error met agreed criteria for a potentially material dispute (26%) (i.e., where the dispute involved a change that could potentially affect the credit score or provided evidence of data mismatches or identity theft)
- 95 cases (36% of cases with potentially material disputes) where all the disputed items were changed in accordance with the dispute letters filed by the consumer
- 108 cases (41% of cases with potentially material disputes) where disputed items were partly changed in accordance with the dispute letters filed by the consumer
- 59 cases (22% of cases with potentially material disputes) in which no changes were imposed by the bureaus that satisfied the consumer’s disputes
- 1 case with no indication of outcome because no new reports were obtainable for that person (for technical reasons).

In Table 41 we represent the outcomes for all 239 cases where there was a potentially material dispute and for which we received confirmation that the letters had been mailed as prepared by the RAs. There were:

- no change to the material information disputed in 19% of the 239 cases with confirmation that disputes were filed
- a full change to all material items disputed in accord with the consumer in 39% of the cases
- a partial change to a material item or full change to just some of the material items disputed in 42% of the cases.

In Table 42, we give additional information about each of the cases with potentially material disputes. In particular, we indicate:

- the total number of items (report entries) disputed (such as a tradeline, collection, inquiry, or public record). When multiple elements are disputed in an entry (such as a collection amount, the collection date and the collection balance), it still counts here as one entry or item disputed.

- The total number of error types (counting the 17 types enumerated in Section 3.3). Here we count the number of types of error but do not increase the count if the same error occurred in more than one entry (tradeline).
- Number of dispute letters prepared (i.e., number of bureaus with which disputes were filed)
- Original credit scores from each of the three bureau reports that constituted the frozen files for the consumer
- Number of bureaus for which the first rescore was done
- Number of bureaus for which the second rescore was done (needed if partial changes were imposed by the bureau related to the dispute filed and the unchanged items could affect the credit score)
- Changes in each of the three credit scores (from rescore 1 or rescore 2 as relevant)
- Whether the score changed by more than a specified amount (10 points in this analysis)
- Whether a score crossed one of the credit-score thresholds (589, 619, 659, 689, or 719) when the frozen file was reconstructed to incorporate all the changes that were actually imposed on the record in accord with the dispute. (These are the sample thresholds provided in FICO credit reports as determining the terms for a 48-month auto loan. We counted only the incidents of crossing into a higher-score grouping.)
- The number of bureaus for which the dispute outcomes resulted in crossing one or more score thresholds
- The number of thresholds that were crossed as a result of all changes made to the consumer's files by the three bureaus in consonance with the disputes
- An indicator of the final outcome for the case as a whole (whether changes were made to the credit file in accord with the consumer's disputes).

In Table 42B we give more details for each case where changes were imposed to a credit file. In particular, we provide the three original credit scores, the results of each rescore, changes to the credit scores as a result of changes to the files that pertained to the consumer's disputes, the revised credit scores to reflect the actual changes that were imposed, the original range in credit scores (difference between highest and lowest credit score) for the consumer, and the range in revised scores. The difference in these ranges provides a measure of convergence in credit scores as a result of the dispute outcome. Note in Table 42B that there are a few instances where, for technical reasons (such as a lock imposed on the file by a credit bureau), it was not possible to obtain a second credit report from all three bureaus. These are identified by a 'U' in the column that summarizes the outcome for the relevant bureau. In those cases, we had no evidence of changes being imposed to correct the alleged errors and the revised credit score was set to the original credit score for our analysis.

Totals for all 263 cases in the list appear at the bottom of Table 42 (Page 56 of Appendix 13). Note that results included:

- An increase of 10 or more points in a credit score from one of the three bureaus for 87 of the 263 cases (33%)

- Crossing of a standard lending threshold that determines terms of a loan in one of the bureau scores for 54 of the 263 cases (21%).

Table 43 shows the heavier concentration of disputes among cases in the lower credit-score groups – with more disputes registered by people with low credit scores and more items in the report allegedly containing erroneous information. Eleven (11) of the 263 cases with material disputes were from the highest credit-score group; 82 were from the lowest credit-score group. The median number of items disputed was 3 overall, but 6 for those with average credit scores below 590. Statistical summaries reflecting the outcomes of these cases are in Tables 44-53.

In Tables 44, 44A, 44B, and 44C we provide the statistics that summarize the effects of the actual changes imposed on the participants' bureau files that addressed the specific disputes. The first set of numbers (Table 44) applies to 405 individual bureau disputes that resulted in at least one change to the bureau's record involving cases where at least one of the disputes with a bureau was potentially material. The second set (Table 44A) applies to the overall results for the 263 cases with potentially material disputes regardless of whether changes were made. The third set (Table 44B) applies to 210 cases for which at least one bureau made a relevant change to its credit file following a dispute (including six cases where the changes were not in accord with the consumer's requests). The fourth set (Table 44C) applies to the 95 cases where all requested changes were made by the relevant bureaus, thus fully satisfying all disputes registered by the consumer. In each that applies to the case overall (Tables 44A, 44B, 44C), we present four measures of the impact, as determined from the changes in credit scores that resulted from rescoring the frozen credit reports. They are:

1. The resulting **change in the participant's maximum (highest) credit score** across all three bureaus (recognizing that, after rescoring, the highest score may occur with a different bureau)
2. The resulting **change in the participant's average credit score** across all three bureaus
3. The resulting **change in the participant's minimum (lowest) credit score** across all three bureaus (again recognizing that the lowest score after rescoring may occur from a different bureau)
4. The resulting **reduction in the range in the participant's credit scores** across all three bureaus (i.e., the **degree of convergence** in the credit scores).

Extracting key numbers from Table 44, we observe that for the 405 bureau disputes that resulted in at least one change to the consumer's credit report for cases with at least one potentially material dispute:

- The median increase in the individual's credit score was zero (0), meaning that less than half of the outcomes for disputes with an individual bureau resulted in any increase in the credit score.
- The average increase in credit score was 11.8 points.
- 25% of the disputes resulted in a credit-score increase of 13 points or more.

From Table 44A we see that for the 263 cases with potentially material disputes,

- The median increase in the individual's highest credit score was zero (0), meaning that less than half of the 263 participants with material disputes had any change in their highest credit score as an outcome of the dispute process.
- The median increase in average credit score was also 0 points.
- The median increase in the lowest credit score was 0 points.
- The median decrease in range in credit scores was 0 points.

The distribution of the effects of the changes in credit score were, however, positively skewed so that the average (mean) changes were greater. Concentrating on the average changes in the measures, we see that

- The average (mean) increase in the individual's highest credit score was 4.9 points.
- The average increase in average credit score was 6.1 points,
- The average increase in lowest credit score was 7.7 points.
- The average decrease in the range of credit scores was 3.5 points.

Concentrating now on the third quartiles of the same measures we note that:

- The highest credit score for the individual increased by 3 or more points for 25% of the participants who filed potentially material disputes.
- The average credit score increased by 7.7 points or more for 25% of the participants who filed potentially material disputes.
- The lowest credit score increased by 8 points or more for 25% of the participants who filed potentially material disputes.
- The difference between the highest and lowest credit score for the individual (range) decreased by 6 points or more for 25% of the participants who filed potentially material disputes.

We remind the reader that the last three sets of statistics are determined by 263 cases (26% of the entire sample) for which there were potentially material disputes and for which the final outcomes were able to be determined by redrawing credit reports from scoreable files.

Further examination of the statistics in Table 44A reveals an interesting pattern for the impacts according to the original credit scores. According to these measures, individuals in the middle credit-score ranges generally experienced greater increases in their credit scores than individuals in the highest and lowest credit-score groupings. Greater convergence in credit scores occurred for disputants in the higher credit-score ranges.

From Table 44B, we observe that considering the 210 consumers for whom at least one bureau made a relevant change to the credit file following a dispute, the impacts of actual changes made to the credit-bureau records upon the consumers' credit scores were:

- An average increase of 9.6 points in the minimum (lowest) credit score from the three bureaus
- An average increase of 7.7 points in the average of the credit scores from the three bureaus
- An average decrease of 3.5 points in the range of credit scores from the three bureaus

From Tables 44C and 45C, we observe that, considering the 95 consumers for whom the changes were made that fully satisfied all potentially material items in dispute, the impacts of actual changes made to the credit-bureau records upon the consumers' credit scores were:

- An average increase of 12.3 points in the minimum (lowest) credit score from the three bureaus
- An average increase of 8.2 points in the average of the credit scores from the three bureaus
- An average decrease of 7.4 points in the range of credit scores from the three bureaus
- An increase of 10 or more points in a credit score from at least one of the three bureaus for 33 of the 95 cases (35%)

Next, with information from Tables 45, 45A, 45B and 45C we similarly consider whether the changes actually imposed by the bureaus would have resulted in an increase of 10 or more points in any of the participant's credit scores. This occurred in

- 32% of the 405 bureau disputes
- 33% of the 263 cases with potentially material disputes
- 41% of the 210 cases with potentially material disputes that resulted in at least one change being made by a bureau
- 35% of the 95 cases with potentially material disputes where all requested changes were made by the bureau(s).

Changes of 10 or more points in a credit score were most likely to occur for disputants in the higher middle credit-score groups than in the lower or highest groups.

The numbers and percentages of cases where one of the lending thresholds was crossed are presented in Tables 46, 46A, 46B and 46C. Changes to the credit files following disputes resulted in the crossing of a standard lending threshold (FICO® score of 589, 619, 659, 689, or 719 points):

- in 65 of the 405 disputes where a bureau made at least one change to the credit file that fully or partly satisfied the dispute (16%)
- in 54 of the 263 cases with potentially material disputes (21%)
- in 54 of the 210 cases (26%) where changes were imposed by at least one bureau
- in 22 of the 95 cases (23%) where all requested changes were made by the relevant bureaus.



Crossing a lending threshold was most likely to occur as a result of a dispute filed by a person in the middle credit-score ranges. There was, of course, no instance of crossing a threshold in the highest score range -- which itself was above the highest threshold.

The distributions of impacts on credit scores are quite skewed, with most cases having a small effect and a few cases having a very large effect. To give a fuller picture of the skewed nature of the outcomes, we present (in Tables 47 to Table 50C) the counts and percentage distributions for the changes in individuals' credit scores as a result of corrections made to the frozen files to reflect confirmed outcomes from the dispute process. Presented are frequency distributions for the changes to individual bureau scores following disputes, for the maximum change in a credit score, and the average of changes in the credit scores for an individual disputant. (Note that the maximum change in credit score is the maximum of the changes in any of the person's credit scores -- not the change in the maximum credit score, which compares the highest of the three credit scores before and after). Again, information is provided for the 405 bureau disputes of cases with at least one dispute on a material item and where a dispute resulted in some change to the record (Table 47), for all 263 cases with potentially material disputes (Tables 47A, 48A, 49A, 50A), for the 210 cases with potentially material disputes that had at least one change to a record (Tables 47B, 48B, 49B, 50B), and for the 97 cases where all requested changes were made (Tables 47C, 48C, 49C, 50C).

Note in Table 48B, for example, that 59% of cases had a maximum change in a credit score less than 10 points; 14% experienced maximum increases between 10 and 19 points; 8% experienced maximum increases between 20 and 29 points, and so on with generally decreasing frequencies for larger changes in maximum credit score. Tables 49A and 50A show the relatively muted changes in average changes in credit score from their dispute outcomes.

Table 51 gives a comprehensive summary of the number of disputes filed and the ultimate classification of the outcomes. In all, from the 1,001 participants who reviewed their credit reports with the university RAs and were judged to provide reliable information, there were:

- 263 cases in which an alleged error met one of our criteria for a potentially material dispute
- 855 alleged occurrences of an error of one of the 17 types listed in Section 3.3 (an average of 3.24 occurrences per case with material dispute and 0.85 per study participant.)
- 590 dispute letters prepared for cases involving a potentially material error (an average of 2.24 letters for each participant with a potentially material dispute)
  - 194 disputes where the CRA made changes that addressed all the potentially material items of concern in the dispute (in  $194/590=33\%$  of disputes)
  - 209 disputes where the CRA made some changes that addressed alleged errors that were potentially material ( $209/590=35\%$  of disputes)

- 187 disputes where the CRA made no changes that addressed the disputes(s) ( $187/590=32\%$  of disputes)
- 1,619 report items (e.g., credit account, mortgage, auto loan, collection account, or public record) that were disputed as having erroneous information
  - 712 (44%) of report items challenged that were changed in a manner that fully addressed the dispute
  - 133 (8%) of report items challenged that were changed in a manner that partly addressed the dispute.
  - 774 (48%) of report items challenged that were not changed to address the dispute.

Breakouts of these tallies according to credit-score tier are also provided in Table 51. Consistent with the results presented in Table 40, the percentage of successful challenges is higher for individuals in the higher credit-score tiers than for those in lower credit-score tiers. This phenomenon is observable when examining outcomes for the case as a whole or when examining outcomes for individual items disputed.

In Table 52 we provide counts of the number of cases in which the different types of material error were alleged to occur. In addition to the counts of the errors, we indicate the number of cases containing alleged errors of that type for which the ultimate outcome for the case as a whole was assessed as:

1. Changes to the record that effectively addressed all potentially material disputes (full changes) in accord with the participant
2. No changes to the record that addressed any of the potentially material disputes (no changes).
3. Mixed results involving changes to the record that partly addressed alleged errors that were potentially material.

Cases with mixed results include instances (a) where partial changes were made to address one or more material disputes registered by the participant and (b) where full changes were made to address some and no changes were made to address others. In either of these two situations, there may be instances where two bureaus differ in their response to a common dispute. One, for example, may change some element of a disputed item while another handles the case by removing the item instead. Some changes may actually have had a negative effect on the credit score.

In the next two columns of Table 52, we first provide the average of changes in credit scores for the frozen files of that case that resulted from applying all the actual changes by the bureaus that subsequently addressed the participant's disputes. Then we provide the average reduction in score range (convergence) that resulted. These are very crude indicators of the significance of these different types of error because the errors are so interdependent. This is easily seen by noting the changes in credit scores that resulted from the 123 cases where one of the alleged errors was a change in former name or former address. This field itself has no effect on credit score. The alleged error must

have occurred in conjunction with other alleged errors in entries that do affect one's credit score.

In the last two columns we provide a pair of factors that combine information about the frequency of an error type and the average of the average credit score changes for consumers following a dispute when that kind of error is present. The first factor is computed by taking the number of cases with full changes to the record times the average of the average of the credit-score changes and dividing the result by 100. The second factor used the number of outcomes with either full or partial changes as the multiple.

There were 141 participants (14% of those in the sample) who claimed that at least one bureau erroneously reported negative information (overdue balances, late payments or charge-off) on some account. In 109 (77%) of those cases, some change was imposed to address an error and the average credit score for those consumers increased by 7.1 points. There were 97 consumers who reported "accounts not mine". In 84 (87%) of those cases, some change was imposed to address an error and the average credit score for those consumers increased 8.4 points. There were 95 cases with disputes on items reported as sent to collection. In 81 (85%), of those cases, changes were imposed and the average credit score for those consumers increased by 8.3 points. The second (more broadly defined) severity factors for those types of error were 8, 7 and 7 respectively. As mentioned above, the combination of these frequencies of occurrence of changes to the record and the average changes on credit scores when they occur following a dispute gives a crude indication of the significance of the various types of error on measurements of individuals' creditworthiness. We must recognize, however, that the number of transactions that potentially give rise to different types of errors varies enormously and that significant accumulation of errors in the reporting of revolving credit can occur with extremely small error rates because the volume of such reports is extremely high. Considering the frequency with which changes occurred to the credit records when errors of a particular type were present and the average change in the average of the consumer's credit scores when changes occurred, we observed that material disputes involving the reporting of payment behavior on revolving credit (such as overdue amounts, late payments and accounts allegedly not belonging to the individual) may have affected consumers the most. The other predominant effects of errors occurred in indication of current account status and collection activity.

Table 53 provides the corresponding information with the counts of alleged errors occurring at the bureau level rather than the case level. The added information in the last four columns again pertains to the outcome for the case as a whole. There are four items that we assessed across all bureau reports (current name and address, former names and addresses, employment history, and other potentially material error) because they did not have a preconceived impact on credit score. Therefore only 17 items (rather than 21) appear in the counts of errors at the bureau level.

### 3.5 Analysis of Individual Items Disputed in Participants' Credit Reports

In our analysis to this point, we have focused on the credit report as a whole and on the information contained therein for generating credit scores. The FTC is further interested in the individual items contained in the report from which that information is derived (e.g., data on individual tradelines such as revolving accounts or mortgage accounts and entries pertaining to collections or obligations related to court decisions). They wished to know, when an item was disputed, whether the dispute was filed with more than one bureau, and, if so, whether the bureaus took the same action following the dispute.

To produce this information, we created a pseudo (masked) item ID for each item from a report that was referenced in a dispute letter and used the same ID across each of the three bureaus when they referred to the same account or public record. That enables us to compare the outcomes at the different bureaus. There may be more than one error associated with an item in the credit report (e.g., an erroneous indication of an historical late payment and an erroneous indicator of the account's current status). For each item, we therefore codified the error with allowance for several types of error and we recorded them in order of their perceived severity (potential effect on credit score).

For each item disputed, we indicate whether the request was (1) to alter the entry or (2) to remove the entry. From our reading of the redrawn credit reports, we determined whether the outcome was (1) no change to the record that could be attributed to the dispute filed, (2) removal of the disputed item, (3) alteration of the disputed item in a way that fully addressed all material aspects of the dispute in accordance with the consumer's request, (4) alteration of the disputed item in a way that partly addressed the concerns of the consumer, or (5) alteration of the disputed item in a way that was not in agreement with the consumer's request.

In all, there were 1,656 individual items referenced in the disputes filed at the three bureaus. Some of these 1,656 items were ignored in producing the tally of 1,619 disputed items recorded in Table 51 at the case level because they were judged, in the review of the case files, to be trivial. A few (such as a name and address) may also have been counted as two items in the former instance and one in the latter. Information from our review of the outcomes for the 1,656 individual items has been entered into an "item-analysis" workbook with spreadsheets that provide the raw data and explanations of the encoding used to describe the nature of disputed items. The spreadsheets have been provided separately to the FTC. Tabulations of information from the item-level spreadsheets appear in Tables 54-59 attached to this report. Table 58 has the raw data for the 1,656 items that allegedly had erroneous information. Table 59 groups disputed items that referred to the same tradeline or public information and compares the outcomes for the 1,021 particular items (some with common disputes) filed at the three bureaus. Note that some outcomes are indicated to be "unknown" because access to a new credit file was denied or it could not be re-scored by FICO with the available information. A few also pertained to cases without a potentially material dispute at any of the bureaus. We provide these data to illustrate the components of the statistics provided in Tables 54-57 where we group the data for item types or nature of the error for ease of interpretation.

In Table 54, we provide a summary of the outcomes according to the type of item disputed for 1,622 items disputed at any of the bureaus for cases where at least one of the bureau disputes was potentially material. From redrawn credit reports, we were able to observe the outcomes for 1,537 of those items (95%). The remaining 85 were unable to be checked for the aforementioned technical reasons. Over all, there were 653 items (42% of the 1,537 items) that were removed (sometimes following a request to alter and sometimes following a request to remove the item); 152 items (10%) that were judged to have been altered fully in agreement with the consumer's intent in the dispute letter; 37 items (2%) that were altered partly in agreement with the consumer's intent; 691 items (45%) with no change attributable to the dispute and just 4 items that were changed in a manner that was incompatible with the consumer's intent.

Tables 54A-54C show how the three bureaus handled the different types of individual items disputed. The percentages of disputed items that were removed to deal with the dispute were  $167/513=33\%$  at Bureau A,  $209/549=38\%$  at Bureau B, and  $275/558=49\%$  at Bureau C. Although the mix of the types of items disputed at the three bureaus was not identical, this suggests that Bureau C was more likely to remove an item that was disputed. We do not know whether this may have been an action taken pending the resolution of the dispute. No consumers reported that they had received messages to that effect.

Tables 55-55E summarize the outcomes according to the locus of the primary error alleged for the item disputed (whether headline information such as name, address, or employer; tradeline data such as late payments; collection information; or erroneous data in a public record). Again, the overall percentages of outcomes in Table 55D beg the question of whether Bureau C, relative to the other bureaus, may be more likely to alter fully or remove information that is alleged to be erroneous (at least temporarily) rather than to leave it unchanged.

In Table 56, we examine further the extent to which the bureaus undertook similar actions when the same item was disputed at more than one bureau. For 149 of the 227 items disputed at two bureaus (66% of such items), the two bureaus took similar actions. For 122 of the 193 items disputed at all three bureaus (63% of such items), all three bureaus took similar actions. For 62 of the 193 items disputed at all three bureaus (32% of such items), two of the three bureaus took similar actions.

Finally, we provide Table 57 as something of a composite picture of the frequency and severity of the types of items and associated disputed information similarly to the way that we characterized alleged errors in information used to generate credit scores (i.e., as a counterpart to the material presented in Tables 52 and 53). This is one way of summarizing how erroneous information may creep into one's credit file and where attention might be focused in determining how to improve accuracy in credit reporting. We noted the change in average credit score attributed to the outcome of all disputes at all bureaus for consumers for each type of error alleged to occur in connection with a disputed item. There were 1,835 alleged errors in item-level information for the 1,622

items disputed by the 263 consumers that had at least one potentially material dispute with a credit bureau.

Frequencies are presented in Table 57 for the different types of items and the related information disputed. To create an index of severity for cases that had alleged such errors, we summed the change in average credit score for each item alleged to contain the error and divided the sum by 100. Two such indices were produced -- the first to reflect outcomes that were fully in agreement with the consumer's request in the dispute letter and the second for cases where the item was either fully or partly changed in agreement with the consumer's wishes. We must emphasize once again that the changes in credit score were determined only at the case level for each bureau – not at the level of items disputed. The latter was not practicable. Thus, the impact of “wrong address” on credit score, for example, is attributable to other errors that had occurred simultaneously. This crude measure of impact leads us to suggest that attention be devoted further to the proper recording of information on collections, to determining carefully whether any item in the file actually belongs to the consumer, to the proper recording of inquiries (hard pulls) in pursuit of credit, and to care in representing late payments.

### **3.6 Additional Data re Disputes in the Research Database, Rescore Summaries, and Dispute Narratives**

The statistics in Tables 1-53 provide a comprehensive overview of the information garnered from this complex study. For a detailed look at the data from which they were derived, the FTC may examine the specific information in the research (SAS) database named **facta319data.sas7db**. Included in the database are brief summaries of the nature of disputes and the dispute outcomes. Further information about cases with disputes is provided in two separate documents entitled “**dispute\_narratives\_umsl**” and “**dispute\_narratives\_ua**”. Information of outcomes at the item level is provided in the Excel workbooks named “**UMSL item level analysis 03192012.xls**” and “**UA item level analysis 04092012.xls**”.

As mentioned earlier, notes of changes made to the frozen credit files for each rescoring action are provided in the cumulative “rescoring results” spreadsheet that FICO delivers to UMSL for integrating rescore results into the research database. This is provided in electronic form as “**rescoredata.xls**”.

## **4. Qualitative Observations**

In the course of the study, we observed several recurring themes that merit further attention by the CRAs as they continue to improve the quality, understandability, and relevance of the data they provide. Beyond the need for accuracy in the reporting of the status of active accounts and payment history, particular concerns arose about the accuracy of information regarding collections, reports of inquiries for new credit and measures of revolving credit utilization that are derived from the record.

Some consumers seemed generally to have difficulty in understanding the reporting of collections because items that were reported for collection agencies did not generally identify the specific creditor or delinquent account that was involved. Other consumers felt helpless when they disputed the legitimacy of items or amounts sent to collection and yet saw no impact of the dispute on their credit scores despite the appearance of a note to that effect on the credit file. (A note on the credit file that the collection is in dispute does not seem necessarily to cause a collection action to be ignored in the computation of a credit score; nor, perhaps, should it.)

Some medical collections were alleged to occur while there were questions about whether insurance should cover a charge or whether charges were properly assessed by a medical provider. In some such situations, collectors neglected to report when individuals fully met their obligations and the remaining record made it appear that the consumers were still burdened by debt that had been discharged.

There is no way that the bureaus can validate whether a collection is for a legitimate debt, but these aforementioned concerns of consumers beg questions of whether it may be too easy for a party (such as a landlord) to report collection activity for questionable items and whether collectors are properly obligated to report when related debts are paid off.

Several consumers alleged that “soft inquiries” or inquiries for new services or changes to contracts for mobile phone services appeared as if they were “hard pulls” by an individual seeking new credit. We also observed an ironic situation where the inquiry for and acquisition of new credit actually resulted in a reduction of the consumer’s debt burden (by paying off an existing loan with some cash and replacing the original loan with a new loan that had a lower interest rate and lower principal). Nevertheless, the person’s credit score was negatively affected despite the stronger credit position because inquiries for new credit and new credit obligations are generally associated with the assumption of higher credit risk. (Credit scores are based on cross-sectional comparisons of the most recent information in consumers’ credit files and do not contain specific information on ability to pay or how an individual’s file has changed from a previous point in time.)

As our research associates prepared for the interviews with the consumers, they compared key items in the credit reports for consistency and noticed the difficulty that one can encounter in estimating revolving-credit utilization. Revolving credit utilization is stipulated in the industry’s educational material as an important element in computing a credit score; yet the sparse reporting of credit limits often makes credit utilization hard to estimate.

## **5. Questions for Future Research**

As the FTC continues its investigation of matters relating to the accuracy and use of credit-bureau data, there are opportunities to build upon the work in this study, taking

advantage of consumer-level information collected in our closing survey and the comprehensive database of information on individuals' credit history. The study participants have benefited from the education they received on the meaning of credit-bureau data and many have appreciated the opportunity to rectify errors that they discovered in their credit reports. This new knowledge may itself have caused individuals to take actions that will improve their credit standing. On the behavioral dimension, research seems warranted to investigate:

- whether the education that occurred from participating in this exercise resulted in the participants' improving their credit standing relative to others in the sampling frame
- how financial literacy and numeracy relate to use of credit and discharging financial responsibilities
- whether individuals without internet access or not proficient in English (such as Spanish speaking minorities) may have different dispositions as to use of credit and be prone to differential risks of errors in their files with the CRAs.

As we related the results of disputes following the examination of the new set of credit reports, the following types of questions occurred:

1. Might an item that was removed by a bureau (possibly because it could not be validated within 30 days as required by FACTA) in response to a dispute reappear at a later time?
2. Were items changed as a direct result of a dispute, or did they roll off naturally?
3. Why were some accounts removed entirely when just some elements in the record were disputed and why did the response to disputes occasionally differ between bureaus?

## **6. Conclusion**

The execution of the study occurred as planned and according to schedule. Participants regularly expressed high satisfaction with the study process, with the education they received as they reviewed their credit records in depth with help from the RAs, and the care with which study protocols protected their privacy while allowing a thorough examination of their credit records. Following the dispute process, there was generally greater agreement in the credit scores across the three bureaus for the individuals who filed disputes.

The results of this study provide the FTC with objective measures of credit-report accuracy and objective measures of the potential effects of such inaccuracies. The study was executed in a manner that addresses the GAO's concerns about the limitations of prior studies. We trust that the findings of this study is responsive to the GAO's desire for "comprehensive information regarding the accuracy of consumer credit reports that can meaningfully inform discussion of what more could or should be done to improve credit report accuracy."



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**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
1	ID0003	1	1	1	767	787	777	1	1	0	0	0	NO	NO	0	0	YES
2	ID0008	2	1	2	808	659	686	2	0	0	111	0	YES	YES	1	2	PARTLY
3	ID0016	1	4	1	782	783	780	1	0	0	0	0	NO	NO	0	0	NO
4	ID0019	6	3	3	570	536	576	3	1	0	49	24	YES	YES	1	1	PARTLY
5	ID0020	2	3	2	587	.	648	2	0	0	0	0	NO	NO	0	0	PARTLY
6	ID0022	7	5	3	594	621	551	3	0	0	0	0	NO	NO	0	0	NO
7	ID0023	5	1	3	683	689	709	3	0	38	0	0	YES	YES	1	2	PARTLY
8	ID0024	5	2	2	727	752	766	2	1	0	0	0	NO	NO	0	0	YES
9	ID0026	1	4	1	644	633	623	1	0	-7	0	0	NO	NO	0	0	YES
10	ID0027	5	2	2	807	776	805	1	0	0	0	0	NO	NO	0	0	NO
11	ID0029	1	1	1	765	761	786	1	0	0	0	0	NO	NO	0	0	YES
12	ID0039	22	3	3	483	491	513	3	3	11	0	0	YES	NO	0	0	PARTLY
13	ID0040	1	1	1	644	647	669	1	0	0	0	0	NO	NO	0	0	YES
14	ID0041	3	1	3	771	749	748	3	0	0	0	0	NO	NO	0	0	NO
15	ID0045	1	6	1	711	720	719	1	0	0	0	0	NO	NO	0	0	NO
16	ID0052	4	2	2	580	607	616	2	1	0	0	6	NO	YES	1	1	PARTLY
17	ID0054	3	2	3	659	714	693	3	0	0	0	0	NO	NO	0	0	NO
18	ID0060	6	3	3	640	596	595	3	1	0	0	25	YES	YES	1	1	PARTLY
19	ID0061	1	5	1	659	803	784	1	0	14	0	0	YES	NO	0	0	YES

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
20	ID0074	6	1	3	516	587	564	3	0	0	0	0	NO	NO	0	0	NO
21	ID0083	1	3	1	625	605	596	1	0	0	0	0	NO	NO	0	0	YES
22	ID0089	20	6	3	548	549	554	3	3	0	15	21	YES	NO	0	0	PARTLY
23	ID0091	4	2	3	643	675	677	2	0	0	0	0	NO	NO	0	0	NO
24	ID0094	4	7	2	791	704	803	1	0	0	108	0	YES	YES	1	1	YES
25	ID0095	1	2	1	511	498	477	1	0	0	0	0	NO	NO	0	0	YES
26	ID0098	2	3	2	558	532	538	1	0	0	0	0	NO	NO	0	0	YES
27	ID0104	2	1	2	694	669	713	2	0	2	0	0	NO	NO	0	0	YES
28	ID0105	1	1	1	591	610	522	1	0	0	0	0	NO	NO	0	0	NO
29	ID0107	8	3	3	542	579	597	3	1	0	0	0	NO	NO	0	0	PARTLY
30	ID0115	7	2	3	583	536	653	3	1	11	0	0	YES	YES	1	1	PARTLY
31	ID0118	2	2	2	662	651	720	2	0	58	97	0	YES	YES	2	5	YES
32	ID0119	1	1	1	677	705	689	1	0	0	0	0	NO	NO	0	0	YES
33	ID0121	4	2	3	709	685	696	3	0	36	10	21	YES	YES	2	2	YES
34	ID0127	1	1	1	672	735	747	1	0	0	0	0	NO	NO	0	0	NO
35	ID0130	12	5	3	543	542	556	3	2	29	0	3	YES	NO	0	0	PARTLY
36	ID0139	2	4	2	533	575	581	2	0	0	0	0	NO	NO	0	0	YES
37	ID0141	1	1	1	692	781	760	1	0	87	0	0	YES	YES	1	1	YES
38	ID0144	8	3	3	579	564	654	3	0	0	0	7	NO	YES	1	1	PARTLY

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
39	ID0149	1	1	1	596	657	627	1	0	0	0	0	NO	NO	0	0	YES
40	ID0152	2	2	2	663	.	674	2	0	11	0	13	YES	NO	0	0	YES
41	ID0154	1	3	1	473	506	551	1	0	0	0	0	NO	NO	0	0	NO
42	ID0155	14	6	3	513	555	543	3	2	18	17	3	YES	NO	0	0	PARTLY
43	ID0156	2	1	2	736	675	671	2	0	0	90	90	YES	YES	2	4	YES
44	ID0163	7	8	3	635	675	590	3	3	2	0	0	NO	NO	0	0	PARTLY
45	ID0164	1	1	1	525	551	537	1	0	0	0	0	NO	NO	0	0	NO
46	ID0167	5	3	3	501	594	527	3	1	0	0	4	NO	NO	0	0	PARTLY
47	ID0169	4	2	3	567	471	497	3	1	8	0	0	NO	NO	0	0	PARTLY
48	ID0171	1	1	1	804	788	789	1	1	0	0	0	NO	NO	0	0	YES
49	ID0179	1	2	1	688	778	758	1	0	0	0	0	NO	NO	0	0	NO
50	ID0182	1	1	1	471	526	535	1	0	7	0	0	NO	NO	0	0	YES
51	ID0191	3	4	3	489	510	531	3	0	0	0	0	NO	NO	0	0	NO
52	ID0192	1	2	1	585	645	628	1	0	0	0	0	NO	NO	0	0	NO
53	ID0193	14	1	3	706	748	723	3	2	-8	0	0	NO	NO	0	0	PARTLY
54	ID0194	2	3	2	631	621	641	2	0	0	0	0	NO	NO	0	0	YES
55	ID0204	1	4	1	580	625	583	1	0	71	0	0	YES	YES	1	2	YES
56	ID0205	13	6	2	496	.	535	2	2	0	0	8	NO	NO	0	0	PARTLY
57	ID0209	10	7	1	816	763	821	1	1	0	41	0	YES	NO	0	0	YES

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
58	ID0213	3	1	3	693	728	675	3	0	0	0	0	NO	NO	0	0	NO
59	ID0214	7	4	3	596	634	577	3	0	0	0	0	NO	NO	0	0	NO
60	ID0215	2	3	2	661	677	672	2	0	0	0	0	NO	NO	0	0	YES
61	ID0217	9	3	3	706	761	733	3	0	44	0	0	YES	YES	1	1	PARTLY
62	ID0221	1	1	1	749	734	764	1	0	0	0	0	NO	NO	0	0	NO
63	ID0226	6	5	3	760	761	754	1	1	0	0	0	NO	NO	0	0	YES
64	ID0231	7	3	1	651	664	602	1	0	0	0	0	NO	NO	0	0	PARTLY
65	ID0233	4	2	3	715	734	725	3	1	0	0	0	NO	NO	0	0	PARTLY
66	ID0234	5	3	3	570	672	644	3	0	0	0	0	NO	NO	0	0	YES
67	ID0242	5	1	2	656	695	684	2	2	22	0	0	YES	YES	1	1	YES
68	ID0246	2	1	2	707	718	708	2	1	0	0	0	NO	NO	0	0	PARTLY
69	ID0250	3	2	3	649	624	623	3	0	0	0	0	NO	NO	0	0	NO
70	ID0253	5	4	3	711	754	706	3	0	0	0	0	NO	NO	0	0	PARTLY
71	ID0255	3	5	2	812	728	743	2	0	0	92	39	YES	NO	0	0	YES
72	ID0260	3	2	1	813	728	791	1	1	0	84	0	YES	NO	0	0	YES
73	ID0262	10	2	3	763	768	767	3	1	11	0	0	YES	NO	0	0	PARTLY
74	ID0271	1	4	1	640	658	639	1	0	-6	0	0	NO	NO	0	0	YES
75	ID0274	13	9	3	523	559	547	3	3	2	9	25	YES	NO	0	0	PARTLY
76	ID0275	3	2	2	425	488	480	2	0	0	0	0	NO	NO	0	0	PARTLY



**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
77	ID0278	5	3	3	640	658	619	1	0	0	0	0	NO	NO	0	0	NO
78	ID0283	6	3	3	573	587	597	3	0	7	0	18	YES	NO	0	0	PARTLY
79	ID0284	1	4	1	577	549	576	1	0	0	0	0	NO	NO	0	0	YES
80	ID0291	11	7	3	664	581	664	3	1	3	31	-5	YES	YES	1	1	YES
81	ID0294	20	5	3	532	514	569	3	7	0	44	0	YES	NO	0	0	NO
82	ID0298	4	4	2	610	541	597	1	0	0	0	0	NO	NO	0	0	YES
83	ID0299	2	2	2	668	694	641	2	0	0	0	0	NO	NO	0	0	NO
84	ID0300	1	2	1	645	664	618	1	1	0	0	0	NO	NO	0	0	YES
85	ID0304	5	3	3	712	719	704	3	2	49	0	0	YES	YES	1	1	PARTLY
86	ID0308	14	11	3	584	549	545	3	2	0	43	30	YES	YES	1	1	PARTLY
87	ID0321	3	1	3	734	759	743	3	0	65	37	54	YES	NO	0	0	YES
88	ID0322	2	4	2	577	580	598	1	0	0	0	0	NO	NO	0	0	YES
89	ID0328	1	2	1	760	765	678	1	0	0	0	0	NO	NO	0	0	NO
90	ID0331	5	3	3	697	684	692	3	1	0	0	0	NO	NO	0	0	PARTLY
91	ID0332	2	4	1	631	640	622	1	0	0	0	0	NO	NO	0	0	NO
92	ID0338	6	2	3	529	541	580	3	0	0	0	0	NO	NO	0	0	NO
93	ID0344	10	7	3	490	532	506	3	1	0	4	0	NO	NO	0	0	PARTLY
94	ID0348	13	8	2		575	592	2	2	0	0	2	NO	NO	0	0	PARTLY
95	ID0349	4	3	3	737	653	659	3	2	4	0	3	NO	NO	0	0	YES

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
96	ID0350	13	2	3	600	638	597	3	1	0	0	19	YES	NO	0	0	PARTLY
97	ID0352	3	2	3	700	765	715	3	0	25	34	9	YES	YES	2	2	YES
98	ID0356	23	9	3	561	508	552	3	3	6	11	35	YES	NO	0	0	PARTLY
99	ID0358	3	2	3	600	596	601	3	0	0	0	0	NO	NO	0	0	NO
100	ID0370	5	4	3	525	576	623	3	0	2	25	4	YES	YES	1	1	PARTLY
101	ID0372	3	5	3	627	624	647	3	3	39	33	19	YES	YES	2	2	NO
102	ID0373	25	6	3	566	536	537	3	2	0	-19	-11	NO	NO	0	0	PARTLY
103	ID0377	3	1	3	559	510	479	3	0	0	0	0	NO	NO	0	0	NO
104	ID0386	2	2	1	597	627	647	1	0	0	0	0	NO	NO	0	0	NO
105	ID0392	1	1	1	576	590	549	1	0	0	0	0	NO	NO	0	0	YES
106	ID0401	2	2	2	566	535	518	2	0	0	0	0	NO	NO	0	0	NO
107	ID0402	1	1	1	656	644	673	1	0	0	0	0	NO	NO	0	0	YES
108	ID0403	3	3	2	638	.	614	2	1	0	0	13	YES	YES	1	1	PARTLY
109	ID0405	7	7	3	686	669	606	3	0	0	0	61	YES	YES	1	2	PARTLY
110	ID0407	6	3	3	646	719	701	3	3	51	56	0	YES	YES	1	2	PARTLY
111	ID0408	4	3	2	623	630	639	2	0	0	6	0	NO	NO	0	0	YES
112	ID0412	13	3	3	694	727	698	3	3	8	1	17	YES	NO	0	0	PARTLY
113	ID0425	30	5	3	486	515	454	3	3	0	0	0	NO	NO	0	0	PARTLY
114	ID0427	2	4	1	723	737	746	1	0	0	0	0	NO	NO	0	0	YES

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
115	ID0428	2	4	2	490	542	466	2	0	0	0	0	NO	NO	0	0	YES
116	ID0430	6	3	3	457	496	472	3	0	0	0	0	NO	NO	0	0	NO
117	ID0432	3	4	3	633	651	659	3	0	21	0	0	YES	NO	0	0	PARTLY
118	ID0434	3	1	2	594	616	569	2	0	0	3	0	NO	YES	1	1	YES
119	ID0437	9	3	3	582	552	587	3	1	0	0	0	NO	NO	0	0	PARTLY
120	ID0445	11	6	2	551	566	.	2	2	0	0	0	NO	NO	0	0	PARTLY
121	ID0450	3	2	3	644	651	630	3	0	0	0	0	NO	NO	0	0	NO
122	ID0456	23	8	1	808	755	791	1	0	0	60	0	YES	NO	0	0	YES
123	ID0469	1	3	1	678	723	681	1	0	0	0	0	NO	NO	0	0	NO
124	ID0479	9	3	3	541	586	584	3	2	14	0	0	YES	NO	0	0	PARTLY
125	ID0481	5	3	3	708	756	708	3	0	9	3	12	YES	YES	1	1	YES
126	ID0482	6	1	3	708	665	643	3	0	0	0	0	NO	NO	0	0	NO
127	ID0487	3	1	3	736	724	714	3	0	0	0	0	NO	NO	0	0	NO
128	ID0493	7	2	3	608	623	632	3	2	29	0	30	YES	YES	2	2	PARTLY
129	ID0498	1	1	1	777	790	776	1	0	0	0	0	NO	NO	0	0	NO
130	ID0502	3	5	2	761	795	779	2	2	17	-4	0	YES	NO	0	0	PARTLY
131	ID0515	4	1	3	817	824	791	3	0	0	0	0	NO	NO	0	0	YES
132	ID0516	25	5	3	586	630	600	3	3	5	-1	5	NO	YES	1	1	PARTLY
133	ID0518	8	7	3	651	635	639	3	1	0	20	0	YES	NO	0	0	PARTLY

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
134	ID0520	1	1	1	732	794	797	1	0	67	0	0	YES	NO	0	0	YES
135	ID0522	15	7	3	690	689	691	3	2	4	8	8	NO	NO	0	0	PARTLY
136	ID0523	9	8	3	637	557	653	3	0	0	0	0	NO	NO	0	0	NO
137	ID0526	9	4	3	668	673	693	3	0	0	0	8	NO	NO	0	0	PARTLY
138	ID0532	11	4	3	548	586	559	3	3	11	0	22	YES	NO	0	0	PARTLY
139	ID0536	13	3	3	562	585	584	3	3	51	60	0	YES	YES	2	3	PARTLY
140	ID0537	5	9	3	713	720	724	3	1	9	7	4	NO	YES	1	1	PARTLY
141	ID0542	1	3	1	661	708	715	1	0	0	0	0	NO	NO	0	0	YES
142	ID0543	2	1	2	717	744	708	2	0	0	0	0	NO	NO	0	0	YES
143	ID0548	2	1	1	753	688	755	1	1	0	8	0	NO	YES	1	1	PARTLY
144	ID0553	2	1	2	780	799	779	2	0	21	0	18	YES	NO	0	0	YES
145	ID0555	10	1	3	672	673	671	3	3	62	0	13	YES	YES	1	2	YES
146	ID0557	4	7	3	583	638	581	3	0	0	0	0	NO	NO	0	0	NO
147	ID0564	3	2	3	741	744	733	3	0	0	0	0	NO	NO	0	0	PARTLY
148	ID0570	4	3	1	580	567	606	1	0	0	0	0	NO	NO	0	0	NO
149	ID0571	4	3	3	704	681	687	3	0	13	0	0	YES	NO	0	0	PARTLY
150	ID0573	2	1	2	656	655	659	2	1	0	0	0	NO	NO	0	0	PARTLY
151	ID0584	4	5	3	615	678	585	3	1	41	0	88	YES	YES	2	4	PARTLY
152	ID0587	1	2	1	662	789	774	1	0	108	0	0	YES	YES	1	2	YES

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
153	ID0590	3	1	2	753	779	776	2	0	10	0	0	YES	NO	0	0	YES
154	ID0592	6	2	3	652	655	650	3	1	0	0	18	YES	YES	1	1	PARTLY
155	ID0597	3	4	3	780	757	779	3	0	7	11	5	YES	NO	0	0	YES
156	ID0599	6	4	2	651	609	641	2	0	0	0	10	YES	NO	0	0	PARTLY
157	ID0605	12	1	3	682	686	695	3	0	0	0	0	NO	NO	0	0	NO
158	ID0606	5	5	2	648	693	636	2	1	0	0	0	NO	NO	0	0	PARTLY
159	ID0614	12	5	2	533	.	552	2	2	0	0	0	NO	NO	0	0	PARTLY
160	ID0616	3	2	2	659	672	637	2	0	0	0	0	NO	NO	0	0	NO
161	ID0623	2	3	1	591	580	559	1	1	0	0	0	NO	NO	0	0	YES
162	ID0626	1	1	1	788	791	742	1	0	0	0	0	NO	NO	0	0	YES
163	ID0627	19	4	3	641	584	596	3	3	0	0	0	NO	NO	0	0	PARTLY
164	ID0628	3	2	2	803	803	791	2	0	0	-6	0	NO	NO	0	0	YES
165	ID0633	4	2	3	801	821	810	3	1	0	0	0	NO	NO	0	0	YES
166	ID0646	4	7	2	721	809	704	2	0	57	0	94	YES	YES	1	1	YES
167	ID0647	9	6	3	552	541	537	3	2	0	0	56	YES	YES	1	1	PARTLY
168	ID0648	3	3	3	796	789	774	3	0	3	5	6	NO	NO	0	0	YES
169	ID0649	21	9	3	522	679	496	3	2	0	10	11	YES	YES	1	1	PARTLY
170	ID0651	5	5	3	695	686	692	3	1	0	11	0	YES	YES	1	1	PARTLY
171	ID0657	11	5	2	584	482	529	2	1	0	11	15	YES	NO	0	0	PARTLY

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
172	ID0671	14	7	3	605	598	615	3	2	47	0	0	YES	YES	1	1	PARTLY
173	ID0672	4	1	2	794	784	754	2	2	0	0	3	NO	NO	0	0	PARTLY
174	ID0674	4	3	3	518	567	546	3	1	0	0	0	NO	NO	0	0	PARTLY
175	ID0677	1	1	1	733	784	759	1	0	0	0	0	NO	NO	0	0	UNKNOWN
176	ID0681	1	2	1	629	645	689	1	1	0	0	0	NO	NO	0	0	YES
177	ID0682	5	1	2	809	763	731	2	0	0	0	0	NO	NO	0	0	YES
178	ID0684	7	3	3	539	577	503	3	1	0	0	0	NO	NO	0	0	PARTLY
179	ID0690	23	5	3	514	488	508	3	2	0	0	0	NO	NO	0	0	PARTLY
180	ID0698	3	3	2	672	738	712	2	0	0	0	0	NO	NO	0	0	YES
181	ID0699	1	1	1	719	772	785	1	0	66	0	0	YES	NO	0	0	YES
182	ID0702	5	1	3	642	632	600	3	2	0	0	0	NO	NO	0	0	NO
183	ID0711	49	7	2	489	.	484	2	1	0	0	49	YES	NO	0	0	YES
184	ID0713	2	2	2	652	589	592	1	0	0	0	0	NO	NO	0	0	NO
185	ID0719	3	3	2	551	486	525	2	0	0	9	0	NO	NO	0	0	PARTLY
186	ID0720	12	3	3	613	564	650	3	2	0	0	0	NO	NO	0	0	PARTLY
187	ID0721	2	2	2	719	703	699	2	0	0	0	0	NO	NO	0	0	YES
188	ID0724	2	2	2	613	648	623	2	0	0	0	0	NO	NO	0	0	PARTLY
189	ID0727	13	6	3	631	630	545	3	2	11	15	11	YES	NO	0	0	PARTLY
190	ID0737	6	3	3	533	503	508	3	0	0	0	0	NO	NO	0	0	NO

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
191	ID0739	3	4	3	779	779	781	3	0	4	0	3	NO	NO	0	0	YES
192	ID0740	3	3	2	579	512	546	2	0	0	0	0	NO	NO	0	0	NO
193	ID0741	2	3	2	799	701	782	2	0	0	0	0	NO	NO	0	0	YES
194	ID0750	18	4	3	576	618	584	3	3	22	0	28	YES	YES	2	2	PARTLY
195	ID0754	2	1	2	693	683	677	2	0	0	6	4	NO	YES	1	1	YES
196	ID0755	43	3	3	464	469	502	3	3	36	30	41	YES	NO	0	0	PARTLY
197	ID0767	5	2	3	683	747	647	3	0	45	40	10	YES	YES	1	2	PARTLY
198	ID0774	3	1	3	709	715	691	3	3	9	6	15	YES	YES	1	1	PARTLY
199	ID0782	3	4	3	528	566	595	3	0	0	0	0	NO	NO	0	0	NO
200	ID0788	9	4	2	618	613	.	2	2	-2	5	0	NO	NO	0	0	PARTLY
201	ID0791	3	3	1	686	704	682	1	0	2	0	0	NO	NO	0	0	YES
202	ID0797	26	10	3	598	561	579	3	2	0	4	0	NO	NO	0	0	PARTLY
203	ID0801	4	3	3	776	797	766	2	2	19	0	28	YES	NO	0	0	PARTLY
204	ID0806	23	2	3	637	666	680	3	3	12	0	127	YES	YES	1	2	PARTLY
205	ID0807	6	5	3	802	801	785	1	1	0	0	23	YES	NO	0	0	YES
206	ID0810	22	8	3	537	582	609	3	3	27	0	4	YES	NO	0	0	PARTLY
207	ID0811	3	2	2	694	658	644	2	0	0	0	0	NO	NO	0	0	YES
208	ID0819	1	5	1	690	709	737	1	0	0	0	0	NO	NO	0	0	NO
209	ID0821	1	1	1	678	710	693	1	0	0	0	0	NO	NO	0	0	YES

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
210	ID0828	9	2	3	797	812	791	3	1	0	0	-8	NO	NO	0	0	PARTLY
211	ID0830	4	2	2	646	745	659	2	1	0	0	0	NO	NO	0	0	PARTLY
212	ID0835	2	1	1	570	631	596	1	0	0	0	0	NO	NO	0	0	YES
213	ID0839	3	1	1	676	683	685	1	0	0	0	15	YES	YES	1	1	YES
214	ID0840	3	1	3	650	691	688	3	0	0	0	0	NO	NO	0	0	NO
215	ID0843	2	4	1	765	753	745	1	0	0	0	0	NO	NO	0	0	YES
216	ID0856	1	3	1	530	573	526	1	0	0	0	0	NO	NO	0	0	YES
217	ID0857	4	2	3	713	719	718	3	2	0	11	0	YES	NO	0	0	PARTLY
218	ID0863	1	2	1	650	702	691	1	0	0	0	0	NO	NO	0	0	YES
219	ID0864	15	7	3	605	573	600	3	2	0	0	0	NO	NO	0	0	PARTLY
220	ID0866	3	1	1	818	830	805	1	1	0	0	0	NO	NO	0	0	PARTLY
221	ID0868	2	1	2	772	702	684	2	0	0	0	14	YES	YES	1	1	YES
222	ID0869	47	7	3	553	582	627	3	2	0	0	0	NO	NO	0	0	PARTLY
223	ID0870	2	2	2	562	542	556	2	0	0	0	0	NO	NO	0	0	NO
224	ID0872	10	2	3	456	539	476	3	3	22	0	0	YES	NO	0	0	PARTLY
225	ID0874	6	6	3	752	781	761	3	2	0	-3	0	NO	NO	0	0	YES
226	ID0875	3	1	3	480	569	523	3	0	0	0	0	NO	NO	0	0	YES
227	ID0877	8	4	3	690	702	673	3	3	18	0	17	YES	YES	1	1	PARTLY
228	ID0878	2	2	2	602	604	602	2	1	0	0	0	NO	NO	0	0	YES



**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
229	ID0879	1	5	1	715	706	712	1	0	0	0	2	NO	NO	0	0	YES
230	ID0883	1	2	1	676	770	751	1	1	0	0	0	NO	NO	0	0	PARTLY
231	ID0885	3	1	3	564	539	564	3	0	0	0	0	NO	NO	0	0	NO
232	ID0886	1	1	1	716	800	793	1	0	0	0	0	NO	NO	0	0	NO
233	ID0901	2	5	1	812	.	769	1	0	0	0	0	NO	NO	0	0	NO
234	ID0903	2	5	2	563	631	653	2	0	0	0	0	NO	NO	0	0	PARTLY
235	ID0910	2	3	2	543	559	571	1	0	0	0	0	NO	NO	0	0	PARTLY
236	ID0911	13	7	3	530	569	552	3	3	12	6	12	YES	NO	0	0	PARTLY
237	ID0923	2	4	2	668	689	676	2	0	0	0	0	NO	NO	0	0	NO
238	ID0924	1	1	1	808	756	715	1	0	0	0	55	YES	YES	1	1	YES
239	ID0926	18	7	3	475	537	571	3	0	0	0	0	NO	NO	0	0	NO
240	ID0927	2	3	2	759	747	709	2	0	16	0	18	YES	YES	1	1	YES
241	ID0936	1	2	1	538	539	582	1	0	0	0	0	NO	NO	0	0	YES
242	ID0937	13	6	3	588	576	570	3	0	0	0	0	NO	NO	0	0	NO
243	ID0943	8	5	3	530	582	581	3	2	0	0	0	NO	NO	0	0	PARTLY
244	ID0944	6	2	3	698	697	704	3	0	0	8	7	NO	NO	0	0	YES
245	ID0945	5	3	1	750	759	725	1	1	0	0	3	NO	NO	0	0	PARTLY
246	ID0946	8	7	3	571	585	462	3	0	0	0	0	NO	NO	0	0	NO
247	ID0949	9	6	3	639	671	676	3	2	0	6	0	NO	NO	0	0	PARTLY

**Table 42 - Impact of Changes Actually Imposed on Credit Reports for Cases with Potentially Material Disputes Using SIGDIF=10 and thresholds at 589, 619, 659, 689, and 719**

dispid	Masked ID	Total No. Items Disp	No. of Error Types	No. of Disp	Orig Score Bureau A	Orig Score Bureau B	Orig Score Bureau C	No. of First Resc	No. of 2nd Resc	Change in Bureau A Score	Change in Bureau B Score	Change in Bureau C Score	Score Change 10+ Points	Score Cross Thresh	No. of Bur with Thresh Cross	Total No. of Thresh Cross	Change Made
248	ID0952	2	1	2	788	826	758	2	0	0	0	0	NO	NO	0	0	NO
249	ID0955	4	3	3	593	553	594	3	1	0	0	0	NO	NO	0	0	PARTLY
250	ID0957	7	2	3	755	755	737	3	0	12	11	18	YES	NO	0	0	YES
251	ID0966	3	2	3	681	721	705	3	0	9	5	5	NO	YES	1	1	YES
252	ID0968	1	1	1	586	593	574	1	0	0	0	0	NO	NO	0	0	NO
253	ID0974	1	2	1	637	662	667	1	0	0	9	0	NO	NO	0	0	YES
254	ID0976	8	6	3	696	685	679	3	0	3	0	0	NO	NO	0	0	PARTLY
255	ID0977	1	3	1	764	769	753	1	1	0	0	0	NO	NO	0	0	PARTLY
256	ID0983	6	1	3	554	557	575	3	0	0	0	0	NO	NO	0	0	NO
257	ID0984	23	2	3	487	486	488	3	2	0	0	0	NO	NO	0	0	PARTLY
258	ID0987	7	3	3	548	586	598	3	2	0	0	0	NO	NO	0	0	PARTLY
259	ID0993	1	2	1	426	471	513	1	0	0	0	0	NO	NO	0	0	YES
260	ID0994	3	5	2	669	684	688	2	0	0	0	3	NO	YES	1	1	YES
261	ID0995	3	4	2	721	743	691	2	1	0	10	61	YES	YES	1	1	PARTLY
262	ID0998	11	5	3	593	546	604	3	3	12	21	-7	YES	NO	0	0	PARTLY
263	ID0999	6	5	3	588	576	577	3	3	29	56	29	YES	YES	3	4	YES
			855	590				575	197				87	54	65	83	

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
1	ID0003	767	787	777	.	.	772	.	.	777	1			P	767	787	777	20	20	0
2	ID0008	808	659	686	.	770	797	.	.	.	2		Y	N	808	770	686	149	122	27
3	ID0019	570	536	576	570	584	600	.	585	.	3	Y	P	Y	570	585	600	40	30	10
4	ID0020	587	.	648	587	.	648	.	.	.	2	N		Y	587	.	648	61	61	0
5	ID0023	683	689	709	721	689	709	.	.	.	3	Y	Y	N	721	689	709	26	32	-6
6	ID0024	727	752	766	.	752	766	.	.	766	2		P	P	727	752	766	39	39	0
7	ID0026	644	633	623	637	.	.	.	.	.	1	Y			637	633	623	21	14	7
8	ID0027	807	776	805	.	776	.	.	.	.	2	Y	P		807	776	805	31	31	.
9	ID0029	765	761	786	.	.	786	.	.	.	1			Y	765	761	786	25	25	0
10	ID0039	483	491	513	497	491	538	494	491	513	3	P	P	P	494	491	513	30	22	8
11	ID0040	644	647	669	.	647	.	.	.	.	1		Y		644	647	669	25	25	0
12	ID0052	580	607	616	.	607	616	.	.	622	2		N	P	580	607	622	36	42	-6
13	ID0060	640	596	595	663	625	620	.	596	.	3	N	P	Y	640	596	620	45	44	1
14	ID0061	659	803	784	673	.	.	.	.	.	1	Y			673	803	784	144	130	14
15	ID0083	625	605	596	.	.	596	.	.	.	1			Y	625	605	596	29	29	0
16	ID0089	548	549	554	548	565	557	548	564	575	3	P	P	P	548	564	575	6	27	-21
17	ID0094	791	704	803	.	812	.	.	812	.	2		P	Y	791	812	803	99	21	78
18	ID0095	511	498	477	.	.	477	.	.	.	1			Y	511	498	477	34	34	0
19	ID0098	558	532	538	.	.	538	.	.	.	2		Y	Y	558	532	538	26	26	0
20	ID0104	694	669	713	696	669	.	.	.	.	2	Y	Y		696	669	713	44	44	0

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
21	ID0107	542	579	597	542	585	597	.	579	.	3	Y	P	Y	542	579	597	55	55	0
22	ID0115	583	536	653	594	536	653	.	536	.	3	Y	P	Y	594	536	653	117	117	0
23	ID0118	662	651	720	720	748	.	.	.	.	2	Y	Y		720	748	720	69	28	41
24	ID0119	677	705	689	.	.	689	.	.	.	1			Y	677	705	689	28	28	0
25	ID0121	709	685	696	745	695	717	.	.	.	3	Y	Y	Y	745	695	717	24	50	-26
26	ID0130	543	542	556	571	543	559	572	542	.	3	P	P	Y	572	542	559	14	30	-16
27	ID0139	533	575	581	533	575	.	.	.	.	2	Y	Y		533	575	581	48	48	0
28	ID0141	692	781	760	779	.	.	.	.	.	1	Y			779	781	760	89	21	68
29	ID0144	579	564	654	585	564	661	.	.	.	3	N	N	Y	579	564	661	90	97	-7
30	ID0149	596	657	627	.	.	627	.	.	.	1			Y	596	657	627	61	61	0
31	ID0152	663	.	674	674	.	687	.	.	.	2	Y		Y	674	.	687	11	13	-2
32	ID0155	513	555	543	530	575	546	531	572	.	3	P	P	Y	531	572	546	42	41	1
33	ID0156	736	675	671	.	765	761	.	.	.	2		Y	Y	736	765	761	65	29	36
34	ID0163	635	675	590	637	675	590	637	675	590	3	P	P	P	637	675	590	85	85	0
35	ID0167	501	594	527	508	594	531	501	.	.	3	P	Y	Y	501	594	531	93	93	0
36	ID0169	567	471	497	585	511	500	575	.	.	3	P	N	N	575	471	497	96	104	-8
37	ID0171	804	788	789	804	.	.	804	.	.	1	P			804	788	789	16	16	0
38	ID0182	471	526	535	478	.	.	.	.	.	1	Y			478	526	535	64	57	7
39	ID0193	706	748	723	697	737	725	698	.	723	3	P	N	P	698	748	723	42	50	-8
40	ID0194	631	621	641	631	.	641	.	.	.	2	Y		Y	631	621	641	20	20	0

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
41	ID0204	580	625	583	651	.	.	.	.	.	1	Y			651	625	583	45	68	-23
42	ID0205	496	.	535	513	.	561	496	.	543	2	P		P	496	.	543	39	47	-8
43	ID0209	816	763	821	.	804	.	.	804	.	1		P		816	804	821	58	17	41
44	ID0215	661	677	672	661	.	672	.	.	.	2	Y		Y	661	677	672	16	16	0
45	ID0217	706	761	733	750	761	733	.	.	.	3	Y	Y	P	750	761	733	55	28	27
46	ID0226	760	761	754	.	.	754	.	.	754	3	P	P	P	760	761	754	7	7	0
47	ID0231	651	664	602	.	664	.	.	.	.	1		P		651	664	602	62	62	0
48	ID0233	715	734	725	715	734	725	.	734	.	3	N	P	N	715	734	725	19	19	0
49	ID0234	570	672	644	579	672	644	.	.	.	3	U	Y	Y	570	672	644	102	102	0
50	ID0242	656	695	684	665	.	684	678	.	684	2	P		P	678	695	684	39	17	22
51	ID0246	707	718	708	707	718	.	.	718	.	2	N	P		707	718	708	11	11	0
52	ID0253	711	754	706	711	754	706	.	.	.	3	Y	N	N	711	754	706	48	48	0
53	ID0255	812	728	743	.	820	782	.	.	.	2		Y	Y	812	820	782	84	38	46
54	ID0260	813	728	791	.	812	.	.	812	.	1		P		813	812	791	85	22	63
55	ID0262	763	768	767	774	768	771	.	.	767	3	Y	P	P	774	768	767	5	7	-2
56	ID0271	640	658	639	634	.	.	.	.	.	1	Y			634	658	639	19	24	-5
57	ID0274	523	559	547	526	559	547	525	568	572	3	P	P	P	525	568	572	36	47	-11
58	ID0275	425	488	480	.	488	480	.	.	.	2		Y	N	425	488	480	63	63	0
59	ID0283	573	587	597	601	597	615	580	.	.	3	P	N	Y	580	587	615	24	35	-11
60	ID0284	577	549	576	.	.	576	.	.	.	1			Y	577	549	576	28	28	0

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
61	ID0291	664	581	664	667	612	659	.	612	.	3	Y	Y	Y	667	612	659	83	55	28
62	ID0294	532	514	569	541	558	573	532	558	569	3	P	P	P	532	558	569	55	37	.
63	ID0298	610	541	597	610	.	.	.	.	.	2	Y		Y	610	541	597	69	69	0
64	ID0300	645	664	618	.	.	618	.	.	618	1			P	645	664	618	46	46	0
65	ID0304	712	719	704	761	722	718	.	719	704	3	Y	P	P	761	719	704	15	57	-42
66	ID0308	584	549	545	638	594	575	.	592	575	3	U	P	P	584	592	575	39	17	22
67	ID0321	734	759	743	799	796	797	.	.	.	3	Y	Y	Y	799	796	797	25	3	22
68	ID0322	577	580	598	.	580	.	.	.	.	2		Y	Y	577	580	598	21	21	0
69	ID0331	697	684	692	745	716	729	.	.	692	3	N	N	P	697	684	692	13	13	0
70	ID0344	490	532	506	496	550	506	.	536	.	3	N	P	N	490	536	506	42	46	-4
71	ID0348	.	575	592	.	581	551	.	575	594	2		P	P	.	575	594	17	19	-2
72	ID0349	737	653	659	737	653	659	741	.	662	3	P	Y	P	741	653	662	84	88	-4
73	ID0350	600	638	597	610	656	616	.	.	616	3	N	N	P	600	638	616	41	38	3
74	ID0352	700	765	715	725	799	724	.	.	.	3	Y	Y	Y	725	799	724	65	75	-10
75	ID0356	561	508	552	595	519	599	567	519	587	3	P	P	P	567	519	587	53	68	-15
76	ID0370	525	576	623	527	607	627	.	601	.	3	Y	P	Y	527	601	627	98	100	-2
77	ID0372	627	624	647	773	758	760	666	657	666	3	P	P	P	666	657	666	23	9	.
78	ID0373	566	536	537	566	526	535	.	517	526	3	Y	P	P	566	517	526	30	49	-19
79	ID0392	576	590	549	576	.	.	.	.	.	1	Y			576	590	549	41	41	0
80	ID0402	656	644	673	.	644	.	.	.	.	1		Y		656	644	673	29	29	0

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
81	ID0403	638	.	614	638	.	627	.	.	627	2	Y		P	638	.	627	24	11	13
82	ID0405	686	669	606	695	679	667	.	.	667	3	N	N	P	686	669	667	80	19	61
83	ID0407	646	719	701	697	727	701	646	775	701	3	Y	P	N	697	775	701	73	78	-5
84	ID0408	623	630	639	.	636	639	.	.	.	2		Y	Y	623	636	639	16	16	0
85	ID0412	694	727	698	702	728	715	702	728	715	3	P	P	P	702	728	715	33	26	7
86	ID0425	486	515	454	508	582	484	486	515	454	3	P	P	P	486	515	454	61	61	0
87	ID0427	723	737	746	.	.	746	.	.	.	1	N	N	Y	723	737	746	23	23	0
88	ID0428	490	542	466	490	542	.	.	.	.	2	Y	U		490	542	466	76	76	0
89	ID0432	633	651	659	654	669	684	.	.	.	3	Y	N	N	654	651	659	26	8	18
90	ID0434	594	616	569	.	619	569	.	.	.	2		Y	Y	594	619	569	47	50	-3
91	ID0437	582	552	587	613	590	589	.	552	.	3	N	P	N	582	552	587	35	35	0
92	ID0445	551	566	.	588	612	.	551	566	.	2	P	P		551	566	.	15	15	0
93	ID0456	808	755	791	.	815	.	.	815	.	1		P		808	815	791	53	24	29
94	ID0479	541	586	584	555	600	584	555	586	.	3	P	P	Y	555	586	584	45	31	14
95	ID0481	708	756	708	717	759	720	.	.	.	3	Y	Y	Y	717	759	720	48	42	6
96	ID0493	608	623	632	608	623	632	637	.	662	3	P	N	P	637	623	662	24	39	-15
97	ID0502	761	795	779	778	795	.	778	791	.	2	P	P		778	791	779	34	13	21
98	ID0515	817	824	791	817	824	791	.	.	.	3	Y	Y	Y	817	824	791	33	33	0
99	ID0516	586	630	600	610	658	606	591	629	605	3	P	P	P	591	629	605	44	38	6
100	ID0518	651	635	639	652	656	654	.	655	.	3	U	P	U	651	655	639	16	16	0

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
101	ID0520	732	794	797	799	.	.	.	.	.	1	Y			799	794	797	65	5	60
102	ID0522	690	689	691	706	713	699	694	697	.	3	P	P	Y	694	697	699	2	5	-3
103	ID0526	668	673	693	679	674	701	668	673	.	3	P	P	Y	668	673	701	25	33	-8
104	ID0532	548	586	559	577	586	581	559	586	581	3	P	P	P	559	586	581	38	27	11
105	ID0536	562	585	584	591	627	584	613	645	584	3	P	P	P	613	645	584	23	61	-38
106	ID0537	713	720	724	722	727	728	722	.	.	3	P	Y	Y	722	727	728	11	6	5
107	ID0542	661	708	715	661	.	.	.	.	.	1	Y			661	708	715	54	54	0
108	ID0543	717	744	708	.	744	708	.	.	.	2		Y	Y	717	744	708	36	36	0
109	ID0548	753	688	755	.	745	.	.	696	.	1		P		753	696	755	67	59	8
110	ID0553	780	799	779	801	.	797	.	.	.	2	Y		Y	801	799	797	20	4	16
111	ID0555	672	673	671	676	676	671	734	673	684	3	P	P	P	734	673	684	2	61	-59
112	ID0564	741	744	733	741	744	733	.	.	.	3	N	N	Y	741	744	733	11	11	0
113	ID0571	704	681	687	717	763	745	.	.	.	3	Y	N	N	717	681	687	23	36	-13
114	ID0573	656	655	659	656	.	659	.	.	659	2	N		P	656	655	659	4	4	0
115	ID0584	615	678	585	615	678	673	656	.	.	3	P	N	Y	656	678	673	93	22	71
116	ID0587	662	789	774	770	.	.	.	.	.	1	Y			770	789	774	127	19	108
117	ID0590	753	779	776	763	779	.	.	.	.	2	Y	Y		763	779	776	26	16	10
118	ID0592	652	655	650	670	655	650	.	.	668	3	N	Y	P	652	655	668	5	16	-11
119	ID0597	780	757	779	787	768	784	.	.	.	3	Y	Y	Y	787	768	784	23	19	4
120	ID0599	651	609	641	.	659	651	.	.	.	2		N	Y	651	609	651	42	42	0



**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
121	ID0606	648	693	636	.	693	636	.	693	.	2		P	Y	648	693	636	57	57	0
122	ID0614	533	.	552	596	.	602	533	.	552	2	P		P	533	.	552	19	19	0
123	ID0616	659	672	637	665	681	.	659	672	.	2	P	P	N	659	672	637	35	35	.
124	ID0623	591	580	559	.	.	559	.	.	559	1			P	591	580	559	32	32	0
125	ID0626	788	791	742	788	.	.	.	.	.	1	Y			788	791	742	49	49	0
126	ID0627	641	584	596	641	626	626	641	584	596	3	P	P	P	641	584	596	57	57	0
127	ID0628	803	803	791	.	797	791	.	.	.	2		Y	N	803	797	791	12	12	0
128	ID0633	801	821	810	801	821	810	.	.	810	3	Y	P	P	801	821	810	20	20	0
129	ID0646	721	809	704	778	.	798	.	.	.	2	Y		Y	778	809	798	105	31	74
130	ID0647	552	541	537	558	541	557	552	.	593	3	P	U	P	552	541	593	15	52	-37
131	ID0648	796	789	774	799	794	780	.	.	.	3	Y	Y	Y	799	794	780	22	19	3
132	ID0649	522	679	496	539	679	507	.	689	507	3	U	P	P	522	689	507	183	182	1
133	ID0651	695	686	692	695	697	692	.	697	.	3	P	P	N	695	697	692	9	5	4
134	ID0657	584	482	529	.	493	544	.	.	544	2		Y	P	584	493	544	102	91	11
135	ID0671	605	598	615	638	600	615	652	.	615	3	P	N	P	652	598	615	17	54	-37
136	ID0672	794	784	754	794	.	775	794	.	757	2	P		P	794	784	757	40	37	3
137	ID0674	518	567	546	518	567	562	.	.	546	3	N	Y	P	518	567	546	49	49	0
138	ID0681	629	645	689	629	.	.	629	.	.	1	P			629	645	689	60	60	0
139	ID0682	809	763	731	809	.	731	.	.	.	2	N		P	809	763	731	78	78	0
140	ID0684	539	577	503	539	577	507	.	.	503	3	U	U	P	539	577	503	74	74	0

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
141	ID0690	514	488	508	576	512	538	.	488	508	3	U	P	P	514	488	508	26	26	0
142	ID0698	672	738	712	.	738	712	.	.	.	2		Y	Y	672	738	712	66	66	0
143	ID0699	719	772	785	785	.	.	.	.	.	1	Y			785	772	785	66	13	53
144	ID0702	642	632	600	661	632	669	.	632	600	3	N	P	P	642	632	600	42	42	.
145	ID0711	489	.	484	510	.	539	.	.	533	2	U		P	489	.	533	5	44	-39
146	ID0713	652	589	592	652	.	.	.	.	.	2	N		Y	652	589	592	63	63	.
147	ID0719	551	486	525	.	495	529	.	.	.	2		Y	N	551	495	525	65	56	9
148	ID0720	613	564	650	613	564	650	613	.	650	3	P	P	P	613	564	650	86	86	0
149	ID0721	719	703	699	719	.	699	.	.	.	2	Y		Y	719	703	699	20	20	0
150	ID0724	613	648	623	613	648	.	.	.	.	2	N	Y		613	648	623	35	35	0
151	ID0727	631	630	545	642	636	635	.	645	556	3	Y	P	P	642	645	556	86	89	-3
152	ID0737	533	503	508	560	532	578	.	503	508	3	U	P	P	533	503	508	30	30	.
153	ID0739	779	779	781	783	779	784	.	.	.	3	Y	Y	Y	783	779	784	2	5	-3
154	ID0741	799	701	782	.	701	782	.	.	.	2		Y	Y	799	701	782	98	98	0
155	ID0750	576	618	584	605	618	609	598	618	612	3	P	P	P	598	618	612	42	20	22
156	ID0754	693	683	677	.	689	681	.	.	.	2		Y	Y	693	689	681	16	12	4
157	ID0755	464	469	502	500	499	543	478	478	543	3	Y	Y	Y	500	499	543	38	44	-6
158	ID0767	683	747	647	728	787	686	.	.	657	3	Y	Y	P	728	787	657	100	130	-30
159	ID0774	709	715	691	727	731	706	718	721	706	3	P	P	P	718	721	706	24	15	9
160	ID0788	618	613	.	633	620	.	616	618	.	2	P	P		616	618	.	5	2	3

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
161	ID0791	686	704	682	688	.	.	.	.	.	1	Y	N	N	688	704	682	22	22	0
162	ID0797	598	561	579	643	589	608	.	565	579	3	N	P	P	598	565	579	37	33	4
163	ID0801	776	797	766	795	.	793	795	.	794	3	P	Y	P	795	797	794	31	3	28
164	ID0806	637	666	680	804	791	807	649	666	807	3	P	P	P	649	666	807	43	158	-115
165	ID0807	802	801	785	.	.	785	.	.	808	3	Y	P	P	802	801	808	17	7	10
166	ID0810	537	582	609	557	604	613	564	.	613	3	P	N	P	564	582	613	72	49	23
167	ID0811	694	658	644	694	658	.	.	.	.	2	Y	Y	.	694	658	644	50	50	0
168	ID0821	678	710	693	.	.	693	.	.	.	1	N	N	Y	678	710	693	32	32	0
169	ID0828	797	812	791	770	812	783	797	.	.	3	P	Y	Y	797	812	783	21	29	-8
170	ID0830	646	745	659	657	.	715	646	.	.	2	P	.	N	646	745	659	99	99	0
171	ID0835	570	631	596	570	.	.	.	.	.	1	Y	.	.	570	631	596	61	61	0
172	ID0839	676	683	685	.	.	700	.	.	.	1	.	.	Y	676	683	700	9	24	-15
173	ID0843	765	753	745	.	753	.	.	.	.	1	.	Y	.	765	753	745	20	20	0
174	ID0856	530	573	526	.	.	526	.	.	.	1	.	.	Y	530	573	526	47	47	0
175	ID0857	713	719	718	800	721	718	.	730	718	3	N	P	P	713	730	718	6	17	-11
176	ID0863	650	702	691	.	702	.	.	.	.	1	N	Y	N	650	702	691	52	52	0
177	ID0864	605	573	600	618	587	635	605	573	.	3	P	P	N	605	573	600	32	32	0
178	ID0866	818	830	805	.	830	.	.	830	.	1	.	P	.	818	830	805	25	25	0
179	ID0868	772	702	684	.	702	698	.	.	.	2	.	Y	Y	772	702	698	88	74	14
180	ID0869	553	582	627	592	587	624	.	582	627	3	U	P	P	553	582	627	74	74	0

**Table 42B Detailed Effects upon Credit Scores of Changes Imposed on Credit Files Following Disputes For Individual Cases Classified Overall as Having Bureau Records Fully or Partially Changed**

Obs	Masked ID	Scr BUR A	Scr BUR B	Scr BUR C	RESC 1 BUR A	RESC 1 BUR B	RESC 1 BUR C	RESC 2 BUR A	RESC 2 BUR B	RESC 2 BUR C	Num Lett	Chge Bur A	Chge Bur B	Chge Bur C	Rev Scr Bur A	Rev Scr Bur B	Rev Scr Bur C	Orig Rnge	New Rnge	SCR Conv
181	ID0872	456	539	476	456	539	476	478	539	476	3	P	P	P	478	539	476	83	63	20
182	ID0874	752	781	761	752	781	761	752	778	.	3	P	P	Y	752	778	761	29	26	3
183	ID0875	480	569	523	480	569	523	.	.	.	3	Y	Y	Y	480	569	523	89	89	0
184	ID0877	690	702	673	742	702	709	708	702	690	3	P	P	P	708	702	690	29	18	11
185	ID0878	602	604	602	602	.	602	602	.	.	2	P	.	Y	602	604	602	2	2	0
186	ID0879	715	706	712	.	.	714	.	.	.	1	.	.	Y	715	706	714	9	9	0
187	ID0883	676	770	751	749	.	.	676	.	.	1	P	.	.	676	770	751	94	94	0
188	ID0903	563	631	653	596	631	.	.	.	.	2	N	Y	.	563	631	653	90	90	0
189	ID0910	543	559	571	550	.	.	.	.	.	2	N	.	Y	543	559	571	28	28	0
190	ID0911	530	569	552	542	591	584	542	575	564	3	P	P	P	542	575	564	39	33	6
191	ID0924	808	756	715	.	.	770	.	.	.	1	.	.	Y	808	756	770	93	52	41
192	ID0927	759	747	709	775	.	727	.	.	.	2	Y	.	Y	775	747	727	50	48	2
193	ID0936	538	539	582	.	539	.	.	.	.	1	.	Y	.	538	539	582	44	44	0
194	ID0943	530	582	581	530	582	581	.	582	581	3	N	P	P	530	582	581	52	52	0
195	ID0944	698	697	704	698	705	711	.	.	.	3	Y	Y	Y	698	705	711	7	13	-6
196	ID0945	750	759	725	.	.	728	.	.	728	1	.	.	P	750	759	728	34	31	3
197	ID0949	639	671	676	639	677	676	.	677	676	3	Y	P	P	639	677	676	37	38	-1
198	ID0955	593	553	594	634	600	640	.	553	.	3	N	P	N	593	553	594	41	41	0
199	ID0957	755	755	737	767	766	755	.	.	.	3	Y	Y	Y	767	766	755	18	12	6
200	ID0966	681	721	705	690	726	710	.	.	.	3	Y	Y	Y	690	726	710	40	36	4





**Table 44 - Changes to the Participant's Credit Score(s) Due to the Dispute Outcome  
Statistics Based on 405 Bureau Disputes with at Least One Change to the Bureau's Record  
Involving Cases where at Least One Dispute was Potentially Material**

Score Change		Average FICO Score					Overall
		<590	590-679	680-749	750-789	>790	
Change in Credit Score	Cases	129	105	107	46	18	405
	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	6.0	3.0	0.0	0.0
	MEAN	8.6	11.2	15.9	16.0	2.8	11.8
	3rd Quartile	12.0	13.0	17.0	18.0	0.0	13.0

**Table 44A - Changes in the Participant's Credit Score(s) Due to the Dispute Outcome  
Statistics Based on 263 Cases with Potentially Material Disputes**

Score Changes		Average FICO Score					Overall
		<590	590-679	680-749	750-789	>790	
Change in Max Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	0.0	0.0	0.0	0.0
	MEAN	5.1	5.4	6.2	1.3	0.5	4.9
	3rd Quartile	2.0	0.0	6.0	2.0	0.0	3.0
Change in Avg Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	1.0	1.7	0.0	0.0
	MEAN	4.6	5.4	8.5	8.2	1.5	6.1
	3rd Quartile	7.3	6.3	11.3	15.7	0.0	7.7
Change in Min Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	0.0	1.5	0.0	0.0
	MEAN	4.3	5.6	10.6	16.4	4.5	7.7
	3rd Quartile	5.0	2.0	10.0	28.0	0.0	8.0
Decrease in Range	1st Quartile	-2.0	-2.0	-3.0	0.0	0.0	0.0
	Median	0.0	0.0	0.0	3.0	0.0	0.0
	MEAN	-1.4	-0.1	5.3	18.1	5.4	3.5
	3rd Quartile	0.5	0.0	6.5	29.0	5.0	6.0



**Table 44B - Changes in Participants' Credit Score(s) for the 210 Cases with Potentially Material Disputes For Which At Least One Bureau Made a Change to the Credit File Following a Dispute**

Score Changes		Average FICO Score					Overall
		<590	590-679	680-749	750-789	>790	
Change in Max Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	0.0	0.0	0.0	0.0
	MEAN	6.8	6.8	7.5	1.6	0.7	6.1
	3rd Quartile	8.0	4.0	9.0	3.0	0.0	6.0
Change in Avg Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	1.2	1.8	4.0	3.7	0.0	2.0
	MEAN	6.1	6.9	10.2	9.8	1.9	7.7
	3rd Quartile	10.3	7.3	13.2	18.3	0.0	10.7
Change in Min Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	2.0	6.0	0.0	0.0
	MEAN	5.7	7.0	12.7	19.7	5.4	9.6
	3rd Quartile	11.0	4.0	14.5	36.0	0.0	11.0
Decrease in Range	1st Quartile	-2.0	-2.0	-3.0	0.0	0.0	0.0
	Median	0.0	0.0	0.0	3.0	0.0	0.0
	MEAN	-1.4	-0.1	5.3	18.1	5.4	3.5
	3rd Quartile	0.5	0.0	6.5	29.0	5.0	6.0

**Table 44C - Changes in Participants' Credit Score(s) for 95 Cases with Potentially Material Disputes For Which All Requested Changes Were Made By the Relevant Bureaus**

Score Changes		Average FICO Score					Overall
		<590	590-679	680-749	750-789	>790	
Change in Max Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	0.0	0.0	0.0	0.0
	MEAN	5.5	5.7	6.8	1.9	1.0	4.9
	3rd Quartile	0.0	3.0	7.0	3.0	0.0	3.0
Change in Avg Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	4.0	4.0	0.0	0.0
	MEAN	4.1	5.7	11.3	11.0	3.2	8.2
	3rd Quartile	0.0	7.3	13.7	21.0	7.7	11.3
Change in Min Score	1st Quartile	0.0	0.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	0.5	8.0	0.0	0.0
	MEAN	2.6	5.8	16.6	22.1	9.5	12.3
	3rd Quartile	0.0	2.0	18.0	47.0	16.0	14.0
Decrease in Range	1st Quartile	0.0	-2.0	0.0	0.0	0.0	0.0
	Median	0.0	0.0	0.0	3.5	0.0	0.0
	MEAN	-2.9	0.1	9.8	20.2	8.5	7.4
	3rd Quartile	0.0	0.0	6.0	43.5	10.0	6.0



















**Table 47 - Counts of Change in a Participant's Credit Score From Dispute(s)  
Statistics Based on 405 Bureau Disputes with at Least One Change to the Bureau's Record  
Involving Cases where at Least One Dispute was Potentially Material**

Change in a Credit Score	Average Original FICO Score					Overall Count
	<590	590-679	680-749	750-789	>790	
	Count	Count	Count	Count	Count	
neg	3	5	1	2	2	13
0-9	87	67	65	28	14	261
10-19	15	13	19	6	.	53
20-29	11	7	2	2	1	23
30-39	4	4	4	1	.	13
40-49	5	2	4	.	1	12
50-59	3	1	4	1	.	9
60-69	1	2	2	3	.	8
70-79	.	1	.	.	.	1
80-89	.	1	1	1	.	3
90-99	.	1	3	1	.	5
100+	.	1	2	1	.	4
<b>Total</b>	129	105	107	46	18	405

**Table 47A - Counts of Maximum Change in a Participant's Credit Score From Dispute(s)  
Statistics Based on 263 Cases with Potentially Material Disputes**

Maximum Change in a Credit Score	Average Original FICO Score					Overall Count
	<590	590-679	680-749	750-789	>790	
	Count	Count	Count	Count	Count	
0-9	58	51	41	17	9	176
10-19	7	7	12	4	.	30
20-29	8	5	.	2	1	16
30-39	1	3	3	.	.	7
40-49	5	1	3	.	1	10
50-59	2	.	1	1	.	4
60-69	1	2	2	3	.	8
70-79	.	1	.	.	.	1
80-89	.	1	1	1	.	3
90-99	.	1	2	1	.	4
100+	.	1	2	1	.	4
<b>Total</b>	82	73	67	30	11	263

**Table 47B - Counts of Maximum Change in a Participant's Credit Score From Dispute(s)  
For 210 Cases With Potentially Material Disputes and At Least One Change Made by A Bureau**

Maximum Change in a Credit Score	Average Original FICO Score					Overall Count
	<590	590-679	680-749	750-789	>790	
	Count	Count	Count	Count	Count	
0-9	38	36	30	12	7	123
10-19	7	7	12	4	.	30
20-29	8	5	.	2	1	16
30-39	1	3	3	.	.	7
40-49	5	1	3	.	1	10
50-59	2	.	1	1	.	4
60-69	1	2	2	3	.	8
70-79	.	1	.	.	.	1
80-89	.	1	1	1	.	3
90-99	.	1	2	1	.	4
100+	.	1	2	1	.	4
<b>Total</b>	62	58	56	25	9	210

**Table 47C - Counts of Maximum Change in a Participant's Credit Score From Dispute(s)  
For 95 Cases With Potentially Material Disputes and All Requested Changes Made by the Relevant Bureaus**

Maximum Change in a Credit Score	Average Original FICO Score					Overall Count
	<590	590-679	680-749	750-789	>790	
	Count	Count	Count	Count	Count	
<b>0-9</b>	14	17	17	10	4	62
<b>10-19</b>	.	1	6	2	.	9
<b>20-29</b>	.	1	.	1	1	3
<b>30-39</b>	.	1	2	.	.	3
<b>40-49</b>	1	.	.	.	1	2
<b>50-59</b>	1	.	.	1	.	2
<b>60-69</b>	.	1	1	3	.	5
<b>70-79</b>	.	1	.	.	.	1
<b>80-89</b>	.	.	1	1	.	2
<b>90-99</b>	.	1	2	1	.	4
<b>100+</b>	.	.	1	1	.	2
<b>Total</b>	16	23	30	20	6	95









**Table 49A - Average Changes in Participant's Credit Scores from the Person's Dispute(s)  
Statistics Based on 263 Cases with Potentially Material Disputes**

Average Change in Credit Score(s) (point change)	Average Original FICO Score					Overall
	<590	590-679	680-749	750-789	>790	
	Count	Count	Count	Count	Count	
neg	1	2	1	1	2	7
0-9	64	59	48	20	8	199
10-19	12	4	7	3	1	27
20-29	2	4	4	4	.	14
30-39	3	1	4	1	.	9
40-49	.	2	.	1	.	3
50-59	.	1	2	.	.	3
60-69	.	.	1	.	.	1
<b>Total</b>	82	73	67	30	11	263

**Table 49B - Average Changes in Participant's Credit Scores from the Person's Dispute(s)  
For 210 Cases With Potentially Material Disputes and At Least One Change Made by A Bureau**

Average Change in Credit Score(s) (point change)	Average Original FICO Score					Overall
	<590	590-679	680-749	750-789	>790	
	Count	Count	Count	Count	Count	
neg	1	2	1	1	2	7
0-9	44	44	37	15	6	146
10-19	12	4	7	3	1	27
20-29	2	4	4	4	.	14
30-39	3	1	4	1	.	9
40-49	.	2	.	1	.	3
50-59	.	1	2	.	.	3
60-69	.	.	1	.	.	1
<b>Total</b>	62	58	56	25	9	210

**Table 49C - Average Changes in Participant's Credit Scores from the Person's Dispute(s)  
For 95 Cases With Potentially Material Disputes and All Requested Changes Made by the Relevant Bureaus**

Average Change in Credit Score(s) (point change)	Average Original FICO Score					Overall
	<590	590-679	680-749	750-789	>790	
	Count	Count	Count	Count	Count	
neg	.	2	.	1	1	4
0-9	14	17	21	11	4	67
10-19	1	1	2	2	1	7
20-29	.	2	3	4	.	9
30-39	1	.	1	1	.	3
40-49	.	.	.	1	.	1
50-59	.	1	2	.	.	3
60-69	.	.	1	.	.	1
<b>Total</b>	16	23	30	20	6	95







**Table 51 - Summary of Disputes Filed and Dispute Outcomes for Cases with Potentially Material Errors  
Grouped by Average Score in FICO Quintiles**

<b>FICO Score Quintile Group</b>	<b>No. of Cases with Disputes</b>	<b>No. of Potentially Material Errors</b>	<b>No. of Dispute Letters</b>	<b>No. of Bureaus Making All Changes</b>	<b>No. of Bureaus Making Some Change</b>	<b>No. of Bureaus Making No Change</b>	<b>No. of Bureau Items Disputed</b>	<b>No. of Items Fully Changed</b>	<b>No. of Items Partly Changed</b>	<b>No. of Items Not Changed</b>
<b>1st: &lt;590</b>	82	333	203	41	88	74	807	307	45	455
<b>2nd: 590-679</b>	73	236	167	46	57	64	407	156	49	202
<b>3rd: 680-749</b>	67	175	144	71	36	37	253	147	21	85
<b>4th: 750-789</b>	30	82	54	27	19	8	103	72	11	20
<b>5th: &gt;790</b>	11	29	22	9	9	4	49	30	7	12
	<b>263</b>	<b>855</b>	<b>590</b>	<b>194</b>	<b>209</b>	<b>187</b>	<b>1619</b>	<b>712</b>	<b>133</b>	<b>774</b>



**Table 52 - Counts of Cases with Alleged Errors at Any Bureau and Outcomes from Related Disputes**

Obs	Type of Error	No. of Cases with Error Type	No. of Full Changes	No. with No Changes	No. of Mixed Results	Average SCR CHG Relev Cases	Average Reduction in Score Ranges	Severity Factor 1	Severity Factor 2
1	Error in no. of accounts with negative items	141	30	32	79	7.1	2.0	2	8
2	Wrong former name or former address	123	66	14	43	3.3	4.0	2	4
3	Error in no. of accounts with nonzero balance	106	28	18	60	6.0	3.2	2	5
4	Wrong current name or current address	105	45	21	39	2.1	4.0	1	2
5	Error in total of outstanding balances	102	26	15	61	6.0	2.8	2	5
6	Accounts not mine	97	17	13	67	8.4	1.7	1	7
7	Error in items sent to collection	95	15	14	66	8.3	1.0	1	7
8	Error in current balance owing on collection items	82	10	11	61	8.2	-0.9	1	6
9	Error in revolving credit utilization	81	49	12	20	1.6	3.6	1	1
10	Error in number of open accounts	79	20	11	48	6.8	3.6	1	5
11	Error in most recent delinquency	76	18	17	41	7.7	2.3	1	5
12	Error in accounts currently overdue	71	17	12	42	8.7	-1.7	1	5
13	Error in revolving credit balance	40	14	6	20	7.9	6.1	1	3
14	Error in no. of recent inquiries for new credit	38	12	9	17	5.9	1.5	1	2
15	Error in Employment history	28	13	4	11	3.9	11.3	1	1
16	Error in public derogatory information	20	5	1	14	7.9	1.3	0	2
17	Error in current mortgage balance	12	2	4	6	11.3	1.7	0	1
18	Error in number of new accounts	4	1	0	3	8.1	14.2	0	0
19	Error in bankruptcy information reported	3	0	1	2	2.7	-8.4	0	0
20	Error in current HELOC balance	1	0	1	0	0.0	.	0	0

**Table 53 - Counts of Bureau Disputes with Alleged Error Types and their Outcomes**

Obs	Type of Error	No. of Bureau Disputes	No. of Full Changes	No. with No Change	No. of Mixed Results	Average Score Change Relev Cases	Average Reduction in Score Ranges	Severity Factor 1	Severity Factor 2
1	Error in no. of accounts with negative items	321	60	77	184	7.1	2.0	4	17
2	Error in no. of accounts with nonzero balance	211	45	38	128	6.0	3.2	3	10
3	Accounts not mine	207	26	34	147	8.4	1.7	2	15
4	Error in total of outstanding balances	199	41	32	126	6.0	2.8	2	10
5	Error in items sent to collection	187	21	22	144	8.3	1.0	2	14
6	Error in current balance owing on collection items	174	14	21	139	8.2	-0.9	1	13
7	Error in most recent delinquency	170	36	39	95	7.7	2.3	3	10
8	Error in accounts currently overdue	155	28	27	100	8.7	-1.7	2	11
9	Error in number of open accounts	144	31	25	88	6.8	3.6	2	8
10	Error in revolving credit utilization	127	80	17	30	1.6	3.6	1	2
11	Error in revolving credit balance	76	25	15	36	7.9	6.1	2	5
12	Error in no. of recent inquiries for new credit	50	15	9	26	5.9	1.5	1	2
13	Error in current mortgage balance	34	4	9	21	11.3	1.7	0	3
14	Error in public derogatory information	31	5	1	25	7.9	1.3	0	2
15	Error in bankruptcy information reported	6	0	3	3	2.7	-8.4	0	0
16	Error in number of new accounts	5	1	0	4	8.1	14.2	0	0
17	Error in current HELOC balance	1	0	1	0	0.0	.	0	0

**Table 54 - Outcomes Grouped by Nature of Item for Individual Items Disputed at any Bureau  
Statistics Based on 1,622 Items for Cases with Potentially Material Disputes**

Item Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Auto Loan	ALTER	.	7	25	29	16	9	86
	REMOVE	.	1	.	5	9	.	15
Header Information	ALTER	.	4	16	19	2	1	42
	REMOVE	.	.	.	28	76	6	110
Collection	ALTER	.	.	2	23	31	6	62
	REMOVE	.	6	1	148	139	16	310
Medical Collection	ALTER	.	.	1	10	14	1	26
	REMOVE	.	4	.	90	91	8	193
Education Loan	ALTER	.	2	18	35	7	5	67
	REMOVE	.	.	.	8	3	4	15
Home Equity Loan	ALTER	.	.	3	4	.	.	7
	REMOVE	.	.	.	3	1	.	4
Inquiry for Credit	REMOVE	.	.	.	40	49	1	90
Installment Loan	ALTER	.	1	3	12	6	1	23
	REMOVE	.	.	.	3	5	.	8
Other	ALTER	.	.	1	1	.	1	3
	REMOVE	.	.	.	1	1	.	2
Mortgage Loan	ALTER	3	7	27	30	11	2	80
	REMOVE	.	.	.	14	3	.	17
Notation on file	ALTER	.	.	.	3	.	.	3
Public Record	ALTER	.	.	7	3	3	1	14
	REMOVE	.	1	1	16	17	1	36
Revolving Account	ALTER	1	2	47	74	55	8	187
	REMOVE	.	2	.	92	114	14	222
<b>Total</b>		<b>4</b>	<b>37</b>	<b>152</b>	<b>691</b>	<b>653</b>	<b>85</b>	<b>1622</b>

**Table 54A - Outcomes Grouped by Primary Alleged Error for Individual Items Disputed at Bureau A  
Statistics Based on 513 Items for Cases with Potentially Material Disputes**

Error Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Auto Loan	ALTER	.	2	10	10	2	5	29
	REMOVE	.	.	.	1	1	.	2
Header Information	ALTER	.	1	6	3	.	1	11
	REMOVE	.	.	.	7	20	5	32
Collection	ALTER	.	.	.	7	6	4	17
	REMOVE	.	2	.	45	34	16	97
Medical Collection	ALTER	.	.	.	3	5	1	9
	REMOVE	.	2	.	37	17	8	64
Education Loan	ALTER	.	.	3	12	6	5	26
	REMOVE	.	.	.	.	1	4	5
Home Equity Loan	ALTER	.	.	1	2	.	.	3
	REMOVE	.	.	.	1	.	.	1
Inquiry for Credit	REMOVE	.	.	.	15	16	1	32
Installment Loan	ALTER	.	1	.	5	1	2	9
	REMOVE	.	.	.	1	1	.	2
Mortgage Loan	ALTER	1	2	5	12	5	1	26
	REMOVE	.	.	.	4	.	.	4
Notation on file	ALTER	.	.	.	1	.	.	1
Public Record	ALTER	.	.	3	1	.	1	5
	REMOVE	.	1	.	6	4	1	12
Revolving Account	ALTER	.	1	12	20	18	8	59
	REMOVE	.	1	.	23	30	13	67
<b>Total</b>		<b>1</b>	<b>13</b>	<b>40</b>	<b>216</b>	<b>167</b>	<b>76</b>	<b>513</b>

**Table 54B - Outcomes Grouped by Primary Alleged Error for Individual Items Disputed at Bureau B**  
**Statistics Based on 549 Items for Cases with Potentially Material Disputes**

Error Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Auto Loan	ALTER	.	4	7	11	4	3	29
	REMOVE	.	1	.	1	1	.	3
Header Information	ALTER	.	2	5	7	1	.	15
	REMOVE	.	.	.	14	25	1	40
Collection	ALTER	.	.	.	9	13	.	22
	REMOVE	.	3	.	53	46	.	102
Medical Collection	ALTER	.	.	.	6	4	.	10
	REMOVE	.	2	.	39	25	.	66
Education Loan	ALTER	.	.	5	10	1	.	16
	REMOVE	.	.	.	8	.	.	8
Home Equity Loan	ALTER	.	.	1	1	.	.	2
	REMOVE	.	.	.	1	.	.	1
Inquiry for Credit	REMOVE	.	.	.	14	12	.	26
Installment Loan	ALTER	.	.	1	5	4	.	10
	REMOVE	.	.	.	1	3	.	4
Other	ALTER	.	.	.	1	.	.	1
Mortgage Loan	ALTER	1	3	13	11	2	1	31
	REMOVE	.	.	.	6	2	.	8
Notation on file	ALTER	.	.	.	1	.	.	1
Public Record	ALTER	.	.	2	1	1	.	4
	REMOVE	.	.	.	4	5	.	9
Revolving Account	ALTER	1	1	17	34	18	1	72
	REMOVE	.	.	.	27	42	.	69
<b>Total</b>		<b>2</b>	<b>16</b>	<b>51</b>	<b>265</b>	<b>209</b>	<b>6</b>	<b>549</b>

**Table 54C - Outcomes Grouped by Primary Alleged Error for Individual Items Disputed at Bureau C  
Statistics Based on 558 Items for Cases with Potentially Material Disputes**

Error Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Auto Loan	ALTER	.	1	9	8	9	1	28
	REMOVE	.	.	.	3	8	.	11
Header Information	ALTER	.	1	5	9	1	.	16
	REMOVE	.	.	.	7	31	.	38
Collection	ALTER	.	.	2	7	11	.	20
	REMOVE	.	1	1	48	56	.	106
Medical Collection	ALTER	.	.	1	1	6	.	8
	REMOVE	.	.	.	15	51	.	66
Education Loan	ALTER	.	2	10	13	.	1	26
	REMOVE	.	.	.	.	2	.	2
Home Equity Loan	ALTER	.	.	1	1	.	.	2
	REMOVE	.	.	.	2	1	.	3
Inquiry for Credit	REMOVE	.	.	.	11	21	.	32
Installment Loan	ALTER	.	.	1	2	1	.	4
	REMOVE	.	.	.	1	1	.	2
Mortgage Loan	ALTER	1	2	9	7	4	.	23
	REMOVE	.	.	.	4	1	.	5
Notation on file	ALTER	.	.	.	1	.	.	1
Revolving Account	ALTER	.	.	19	20	20	.	59
	REMOVE	.	1	.	43	41	1	86
Public Record	ALTER	.	.	2	1	2	.	5
	REMOVE	.	.	1	6	7	.	14
Other	REMOVE	.	.	.	.	1	.	1
<b>Total</b>		<b>1</b>	<b>8</b>	<b>61</b>	<b>210</b>	<b>275</b>	<b>3</b>	<b>558</b>

**Table 55 - Outcomes Grouped by Primary Alleged Error for Individual Items Disputed at any Bureau  
Statistics Based on 1,622 Items for Cases with Potentially Material Disputes**

Error Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Header data	ALTER	.	4	16	21	2	1	44
	REMOVE	.	.	.	30	77	6	113
Tradeline data	ALTER	4	19	127	185	98	28	461
	REMOVE	.	3	.	146	143	25	317
Other	ALTER	.	.	.	3	1	4	8
	REMOVE	.	.	.	1	1	1	3
Credit inquiries	REMOVE	.	.	.	40	48	1	89
Collection data	ALTER	.	.	2	31	41	1	75
	REMOVE	.	6	1	182	201	12	402
Public record	ALTER	.	.	5	3	3	1	12
	REMOVE	.	1	1	16	15	1	34
Duplicate record	REMOVE	.	4	.	33	23	4	64
<b>Total</b>		<b>4</b>	<b>37</b>	<b>152</b>	<b>691</b>	<b>653</b>	<b>85</b>	<b>1622</b>

**Table 55A - Outcomes Grouped by Primary Alleged Error for Individual Items Disputed at Bureau A**  
**Statistics Based on 513 Items for Cases with Potentially Material Disputes**

Error Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Header data	ALTER	.	1	6	3	.	1	11
	REMOVE	.	.	.	8	21	5	34
Tradeline data	ALTER	1	6	32	61	34	21	155
	REMOVE	.	2	.	48	43	24	117
Credit inquiries	REMOVE	.	.	.	15	16	1	32
Collection data	ALTER	.	.	.	10	9	1	20
	REMOVE	.	2	.	55	34	12	103
Public record	ALTER	.	.	2	1	.	1	4
	REMOVE	.	1	.	6	4	1	12
Duplicate record	REMOVE	.	1	.	8	6	4	19
Other	ALTER	.	.	.	1	.	4	5
	REMOVE	.	.	.	.	.	1	1
<b>Total</b>		<b>1</b>	<b>13</b>	<b>40</b>	<b>216</b>	<b>167</b>	<b>76</b>	<b>513</b>



**Table 55B - Outcomes Grouped by Primary Alleged Error for Individual Items Disputed at Bureau B  
Statistics Based on 549 Items for Cases with Potentially Material Disputes**

Error Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Header data	ALTER	.	2	5	8	1	.	16
	REMOVE	.	.	.	14	25	1	40
Tradeline data	ALTER	2	8	45	74	29	5	163
	REMOVE	.	1	.	45	49	.	95
Other	ALTER	.	.	.	1	1	.	2
Credit inquiries	REMOVE	.	.	.	14	12	.	26
Collection data	ALTER	.	.	.	13	16	.	29
	REMOVE	.	4	.	76	65	.	145
Public record	ALTER	.	.	1	1	1	.	3
	REMOVE	.	.	.	4	4	.	8
Duplicate record	REMOVE	.	1	.	15	6	.	22
<b>Total</b>		2	16	51	265	209	6	549

**Table 55C - Outcomes Grouped by Primary Alleged Error for Individual Items Disputed at Bureau C  
Statistics Based on 558 Items for Cases with Potentially Material Disputes**

Error Type and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Header data	ALTER	.	1	5	10	1	.	17
	REMOVE	.	.	.	8	31	.	39
Tradeline data	ALTER	1	5	50	50	35	2	143
	REMOVE	.	.	.	53	50	1	104
Credit inquiries	REMOVE	.	.	.	11	20	.	31
Collection data	ALTER	.	.	2	8	16	.	26
	REMOVE	.	.	1	51	102	.	154
Public record	ALTER	.	.	2	1	2	.	5
	REMOVE	.	.	1	6	7	.	14
Duplicate record	REMOVE	.	2	.	10	10	.	22
Other	ALTER	.	.	.	1	.	.	1
	REMOVE	.	.	.	1	1	.	2
<b>Total</b>		<b>1</b>	<b>8</b>	<b>61</b>	<b>210</b>	<b>275</b>	<b>3</b>	<b>558</b>

**Table 55D - Counts of Overall Outcomes of Disputes at Different Bureaus  
Statistics Based on 1,622 Items for Cases with Potentially Material Disputes**

Bureau and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Bureau A	ALTER	1	7	40	76	43	28	195
	REMOVE	.	6	.	140	124	48	318
Bureau B	ALTER	2	10	51	97	48	5	213
	REMOVE	.	6	.	168	161	1	336
Bureau C	ALTER	1	6	59	70	54	2	192
	REMOVE	.	2	2	140	223	1	368
<b>Total</b>		4	37	152	691	653	85	1622

**Table 55E - Percentage Outcomes of Disputes at Different Bureaus  
Statistics Based on 1,622 Items for Cases with Potentially Material Disputes**

Bureau and Request		Altered Differently	Altered Partly	Altered Fully	Not Changed	Removed	Unknown	Total
Bureau A	ALTER	0.5	3.6	20.5	39.0	22.1	14.4	100.0
	REMOVE	.	1.9	.	44.0	39.0	15.1	100.0
Bureau B	ALTER	0.9	4.7	23.9	45.5	22.5	2.3	100.0
	REMOVE	.	1.8	.	50.0	47.9	0.3	100.0
Bureau C	ALTER	0.5	3.1	30.7	36.5	28.1	1.0	100.0
	REMOVE	.	0.5	0.5	38.0	60.6	0.3	100.0
<b>Total</b>		0.2	2.3	9.4	42.6	40.3	5.2	100.0

**Table 56 - Comparison of Requests and Outcomes Across Bureaus  
for the 997 Reported Items that constitute the 1,622 Individual Items Disputed at All Three Bureaus  
Based Cases with a Potentially Material Dispute at One or More Bureaus**

Number of Bureaus Involved and Number of Similar Requests		No similar action	One similar action	Three similar actions	Total
1	No similar request	569	.	.	569
2	No similar request	2	2	.	4
	One similar request	78	149	.	227
3	One similar request	.	4	.	4
	Three similar requests	9	62	122	193
<b>Total</b>		658	217	122	997

**Table 57 - Item Error Types with Severity Indices Reflecting Frequency of Occurrence and Aggregate Severity of all Coinciding Errors Based on Average Change in Credit Scores from All Disputes**

Obs	Item Type	Locus of Error	Number of Instances	Average Score Change	Full Change Severity Index	Full or Part Change Index
1	Medical Collection	COLLECTION REPORTED FOR DEBT NOT OWED	192	15.3490	1450.33	1589.33
2	Revolving Account	ACCOUNT NOT MINE	174	9.4904	1254.67	1254.67
3	Collection	COLLECTION REPORTED FOR DEBT NOT OWED	234	6.5100	1059.00	1074.33
4	Header Information	Name or Address	142	5.2629	492.67	508.00
5	Inquiry for Credit	INQUIRY RECORDED FOR CREDIT NOT SOUGHT	89	10.8127	403.67	403.67
6	Mortgage Loan	WRONG HIST. LATE PMT	52	10.9359	365.00	365.00
7	Revolving Account	WRONG HIST. LATE PMT	69	7.0725	364.67	364.67
8	Collection	WRONG CURENT BALANCE ON COLLECTION	42	10.3651	364.00	364.00
9	Collection	ACCOUNT NOT MINE	88	7.0568	235.00	261.00
10	Revolving Account	WRONG CURRENT BALANCE	59	5.0056	255.43	255.43
11	Mortgage Loan	WRONG CURRENT BALANCE	20	15.7167	200.33	255.00
12	Public Record	PUBLIC RECORD NOT WARRANTED	31	9.1075	153.33	175.33
13	Revolving Account	WRONG PAST DUE BALANCE	19	8.2456	151.33	151.33
14	Collection	WRONG ORIG COLLECTION AMOUNT	12	16.9444	141.33	141.33
15	Revolving Account	ERROR IN DESCR NOTES	38	3.5263	125.67	125.67
16	Mortgage Loan	WRONG CURRENT STATUS	32	11.6146	87.33	123.51
17	Collection	WRONG CURRENT STATUS	9	13.1111	118.00	118.00
18	Revolving Account	WRONG CURRENT STATUS	45	8.8593	116.72	116.72
19	Mortgage Loan	WRONG PAST DUE BALANCE	15	11.8000	114.00	114.36
20	Auto Loan	WRONG CURRENT BALANCE	43	3.5581	86.33	96.33
21	Education Loan	WRONG HIST. LATE PMT	24	4.2083	29.33	92.67
22	Auto Loan	ERROR IN DESCR NOTES	15	7.3333	49.67	91.33
23	Installment Loan	ACCOUNT NOT MINE	8	11.5000	86.67	86.67
24	Collection	ERROR IN DESCR NOTES	3	25.0000	75.00	75.00
25	Auto Loan	WRONG HIST. LATE PMT	20	8.1000	59.04	71.04
26	Public Record	ERROR IN PUBLIC RECORD INFO	15	8.3333	68.33	68.33
27	Medical Collection	WRONG CURENT BALANCE ON COLLECTION	20	4.7167	65.33	65.33

**Table 57 - Item Error Types with Severity Indices Reflecting Frequency of Occurrence and Aggregate Severity of all Coinciding Errors Based on Average Change in Credit Scores from All Disputes**

Obs	Item Type	Locus of Error	Number of Instances	Average Score Change	Full Change Severity Index	Full or Part Change Index
28	Installment Loan	ERROR IN DESCR NOTES	10	14.6000	47.67	59.67
29	Auto Loan	WRONG CURRENT STATUS	32	3.1042	23.01	59.01
30	Header Information	EMPLOYMENT	9	7.3333	57.33	57.33
31	Education Loan	WRONG CURRENT STATUS	11	5.1818	57.00	57.00
32	Collection	WRONG CURRENT BALANCE	2	21.5000	43.00	43.00
33	Mortgage Loan	ACCOUNT NOT MINE	10	6.0667	40.67	40.67
34	Mortgage Loan	ERROR IN DESCR NOTES	8	7.0000	18.67	37.33
35	Auto Loan	WRONG PAST DUE BALANCE	16	6.9167	37.11	37.17
36	Home Equity Loan	WRONG CURRENT STATUS	3	14.4444	31.33	31.33
37	Installment Loan	WRONG CURRENT BALANCE	12	4.0833	29.00	29.00
38	Revolving Account	DUPLICATE RECORD OF TRADELINE	38	0.6228	22.33	27.67
39	Installment Loan	WRONG CURRENT STATUS	8	6.4583	13.67	25.67
40	Auto Loan	ACCOUNT NOT MINE	9	3.3704	23.67	23.67
41	Header Information	SSN digits	1	20.0000	20.00	20.00
42	Medical Collection	ACCOUNT NOT MINE	6	17.3333	17.33	17.33
43	Revolving Account	BAL NOT SHOWN AS DISCH IN BKRPTCY	3	5.4444	16.33	16.33
44	Education Loan	WRONG CURRENT BALANCE	33	0.4848	16.00	16.00
45	Education Loan	ERROR IN DESCR NOTES	5	6.2667	15.67	15.67
46	Revolving Account	WRONG LAST 4 DIGITS OF ACCT	2	7.6667	15.33	15.33
47	Installment Loan	BAL NOT SHOWN AS DISCH IN BKRPTCY	1	12.0000	12.00	12.00
48	Home Equity Loan	WRONG HIST. LATE PMT	5	4.7333	9.67	9.67
49	Home Equity Loan	WRONG PAST DUE BALANCE	1	9.6667	9.67	9.67
50	Installment Loan	WRONG PAST DUE BALANCE	7	3.7143	7.06	7.06
51	Other	ACCOUNT NOT MINE	2	5.0000	7.00	7.00
52	Revolving Account	REQUEST REMOVE CLOSED ACCT	3	2.3333	7.00	7.00
53	Other	ERROR IN DESCR NOTES	1	4.3333	4.33	4.33
54	Auto Loan	DUPLICATE RECORD OF TRADELINE	4	0.9167	0.00	3.67

**Table 57 - Item Error Types with Severity Indices Reflecting Frequency of Occurrence and Aggregate Severity of all Coinciding Errors Based on Average Change in Credit Scores from All Disputes**

Obs	Item Type	Locus of Error	Number of Instances	Average Score Change	Full Change Severity Index	Full or Part Change Index
55	Auto Loan	WRONG DATE OPENED	2	3.6667	0.00	3.67
56	Collection	DUPLICATE RECORD OF TRADELINE	2	2.6667	0.00	2.67
57	Collection	WRONG PAST DUE BALANCE	2	21.5000	0.43	0.43
58	Education Loan	WRONG PAST DUE BALANCE	1	12.0000	0.12	0.12
59	Auto Loan	OTHER TRADELINE MATTER	1	3.6667	0.00	0.04
60	Auto Loan	Name or Address	2	0.6667	0.00	0.00
61	Auto Loan	REQUEST REMOVE OLD ACCT	2	0.0000	0.00	0.00
62	Auto Loan	WRONG LAST ACTIVITY DATE	1	3.6667	0.00	0.00
63	Collection	DUPLICATE COLLECTION RECORD	3	0.8889	0.00	0.00
64	Collection	MISUNDERSTANDING	4	0.0000	0.00	0.00
65	Collection	NOTE OR DESCR NEEDED FOR COLL	1	0.0000	0.00	0.00
66	Collection	Name or Address	2	0.0000	0.00	0.00
67	Education Loan	DUPLICATE RECORD OF TRADELINE	13	0.0000	0.00	0.00
68	Education Loan	WRONG LARGEST BALANCE	4	0.0000	0.00	0.00
69	Home Equity Loan	ACCOUNT NOT MINE	2	0.0000	0.00	0.00
70	Inquiry for Credit	Legal Item	1	0.0000	0.00	0.00
71	Installment Loan	WRONG HIST. LATE PMT	3	14.0000	0.00	0.00
72	Medical Collection	DUPLICATE COLLECTION RECORD	1	0.0000	0.00	0.00
73	Medical Collection	OTHER COLLECTION MATTER	1	0.0000	0.00	0.00
74	Medical Collection	WRONG CURRENT BALANCE	1	10.3333	0.00	0.00
75	Mortgage Loan	WRONG LARGEST BALANCE	3	0.0000	0.00	0.00
76	Notation on file	ERROR IN SUMMARY	2	6.3333	0.00	0.00
77	Notation on file	MISUNDERSTANDING	1	6.3333	0.00	0.00
78	Other	WRONG CURRENT BALANCE	1	7.0000	0.00	0.00
79	Other	WRONG CURRENT STATUS	1	0.0000	0.00	0.00
80	Other	WRONG PAST DUE BALANCE	1	7.0000	0.00	0.00
81	Public Record	DUPLICATE PUBLIC RECORD	2	0.0000	0.00	0.00



**Table 57 - Item Error Types with Severity Indices Reflecting Frequency of Occurrence and Aggregate Severity of all Coinciding Errors Based on Average Change in Credit Scores from All Disputes**

Obs	Item Type	Locus of Error	Number of Instances	Average Score Change	Full Change Severity Index	Full or Part Change Index
82	Public Record	DUPLICATE RECORD OF BANKRUPTCY	1	0.0000	0.00	0.00
83	Public Record	WRONG CURRENT BALANCE	2	0.0000	0.00	0.00
84	Revolving Account	DUPLICATE RECORD OF LATE PMT	1	0.0000	0.00	0.00
85	Revolving Account	MISUNDERSTANDING	2	0.0000	0.00	0.00
86	Revolving Account	Name or Address	1	1.0000	0.00	0.00
87	Revolving Account	WRONG LARGEST BALANCE	3	-0.6667	0.00	0.00
88	Revolving Account	Wrong credit limit	3	0.0000	0.00	0.00
89	Education Loan	ACCOUNT NOT MINE	1	-1.0000	-1.00	-1.00
90	Revolving Account	OTHER TRADELINE MATTER	1	-1.0000	-1.00	-1.00
91	Home Equity Loan	DUPLICATE RECORD OF TRADELINE	2	-1.3333	-2.67	-2.67
92	Medical Collection	NOTE OR DESCR NEEDED FOR COLL	6	-10.0000	-40.00	-40.00
			<b>1835</b>			

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1	ID0003	AMEXSEP2007	TRU	777	B2			ALTER	REMOVED	REV
2	ID0008	CJAPRIL2010	EXP	659	E1			REMOVE	REMOVED	PR
3	ID0008	CJAPRIL2010	TRU	686	E1			REMOVE	NONE	PR
4	ID0016	ALLIANCEX7797	EXP	783	B2			REMOVE	NONE	MRTG
5	ID0019	GRANT&WEBERX1899	EXP	536	D1			REMOVE	NONE	COLLMED
6	ID0019	GRANT&WEBERX1900	EXP	536	D1			REMOVE	NONE	COLLMED
7	ID0019	GRANTMERCANTILEAGEX06T7	EXP	536	D1			REMOVE	NONE	COLLMED
8	ID0019	GREENTREENOV1998	EFX	570	B1			REMOVE	REMOVED	INST
9	ID0019	GREENTREENOV1998	EXP	536	B1			REMOVE	REMOVED	INST
10	ID0019	HIGHLANDSDEC2005	TRU	576	B1			REMOVE	REMOVED	INST
11	ID0020	182YCJAN2007	EFX	587	D1			REMOVE	NONE	COLLMED
12	ID0020	FRESNCBCOLJAN2007	TRU	648	D1			REMOVE	REMOVED	COLLMED
13	ID0022	DOEX9341	EFX	594	B3			ALTER	NONE	ED
14	ID0022	DOEX9341	TRU	551	B3			ALTER	NONE	ED
15	ID0022	DOEX9342	EFX	594	B3			ALTER	NONE	ED
16	ID0022	DOEX9342	TRU	552	B3			ALTER	NONE	ED
17	ID0022	VERIZONJUN2008	EFX	594	B2			ALTER	NONE	REV
18	ID0022	VERIZONJUN2008	EXP	621	B2			ALTER	NONE	REV
19	ID0022	VERIZONJUN2008	TRU	553	B2			ALTER	NONE	REV
20	ID0023	PRX0018	EXP	689	E1			REMOVE	REMOVED	PR
21	ID0023	PRX0018	TRU	709	E1			REMOVE	NONE	PR
22	ID0023	PRX2093	EFX	683	E1			REMOVE	REMOVED	PR
23	ID0023	PRX2093	EXP	689	E1			REMOVE	REMOVED	PR
24	ID0023	PRX2093	TRU	709	E1			REMOVE	NONE	PR
25	ID0024	BURDINESMCFDSBAPR1985	TRU	766	B7			ALTER	REMOVED	REV
26	ID0024	BURDINESMCFDSBOCT1984	TRU	766	B7			ALTER	REMOVED	REV
27	ID0024	FORMERNAME	TRU	766	A1			REMOVE	REMOVED	FRMNAME
28	ID0024	FRMRNAME1	EXP	752	A1			REMOVE	REMOVED	FRMNAME

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
29	ID0024	FRMRNAME2	EXP	752	A1			REMOVE	NONE	FRMNAME
30	ID0026	TRIADFINCLJAN2004	EFX	644	B2	B5	B6	ALTER	AY	A
31	ID0027	BANKOFTHEWESTJULY1995	EXP	776	B7			ALTER	NONE	INST
32	ID0027	FORMERNAME	EFX	807	A1			REMOVE	NONE	FRMNAME
33	ID0027	FORMERNAME1	EXP	776	A1			REMOVE	REMOVED	FRMNAME
34	ID0027	FORMERNAME2	EXP	776	A1			REMOVE	REMOVED	FRMNAME
35	ID0027	SDMEDICALFDERALFEB2002	EXP	776	B7			ALTER	NONE	A
36	ID0029	224MORTGAGES/MORTGAGESVCAPRIL6,201	TRU	786	F6			REMOVE	REMOVED	INQ
37	ID0039	COLL\$159MAR2007	EXP	491	D1			REMOVE	NONE	COLLMED
38	ID0039	COLL\$159MAR2007	TRU	513	D1			REMOVE	NONE	COLLMED
39	ID0039	COLL\$168JUL2008	EXP	491	D1			REMOVE	REMOVED	COLLMED
40	ID0039	COLL\$168JUL2008	TRU	513	D1			REMOVE	REMOVED	COLLMED
41	ID0039	COLL\$206NOV2005	EXP	491	D1			REMOVE	NONE	COLL
42	ID0039	COLL\$20APR2006	EXP	491	D1			REMOVE	REMOVED	COLLMED
43	ID0039	COLL\$386APR2006	EXP	491	D1			REMOVE	REMOVED	COLLMED
44	ID0039	COLL\$386APR2006	TRU	513	D1			REMOVE	REMOVED	COLLMED
45	ID0039	COLL\$51JAN2007	EXP	491	D1			REMOVE	REMOVED	COLLMED
46	ID0039	COLL\$51JAN2007	TRU	513	D1			REMOVE	REMOVED	COLLMED
47	ID0039	COLL\$677SEP2007	EXP	491	D1			REMOVE	REMOVED	COLL
48	ID0039	COLL\$677SEP2007	TRU	513	D1			REMOVE	REMOVED	COLL
49	ID0039	COLL\$75OCT2007	EXP	491	D1			REMOVE	REMOVED	COLLMED
50	ID0039	COLL\$75OCT2007	TRU	513	D1			REMOVE	REMOVED	COLLMED
51	ID0039	COLL\$79JUL2006	EXP	491	D1			REMOVE	REMOVED	COLLMED
52	ID0039	COLL\$79JUL2006	TRU	513	D1			REMOVE	REMOVED	COLLMED
53	ID0039	COLL\$79OCT2008	EFX	483	D1			REMOVE	REMOVED	COLLMED
54	ID0039	COLL\$96APR2006	EXP	491	D1			REMOVE	REMOVED	COLLMED
55	ID0039	COLL\$96APR2006	TRU	513	D1			REMOVE	REMOVED	COLLMED
56	ID0039	PR\$5010DEC2008	EXP	491	E1			REMOVE	NONE	PR

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
57	ID0039	PR\$5010DEC2008	TRU	513	E1			REMOVE	NONE	PR
58	ID0039	PRNO.594VC10590DEC2008	EFX	483	E1			REMOVE	NONE	PR
59	ID0040	PRBKRPTCYAPR5	EXP	647	F3			REMOVE	REMOVED	PR
60	ID0041	AMERICASSEX4801	EFX	771	B3			REMOVE	NONE	MRTG
61	ID0041	AMERICASSEX4801	EXP	749	B3			REMOVE	NONE	MRTG
62	ID0041	AMERICASSEX4801	TRU	748	B3			REMOVE	NONE	MRTG
63	ID0045	CHASEMRTGEDEC2001	EXP	720	B2			ALTER	NONE	MRTG
64	ID0052	CABANAROYALARMSDEC2003	TRU	616	D3			ALTER	REMOVED	COLL
65	ID0052	MEDFORDPROPERTYCOOCT2004	TRU	616	D1			REMOVE	REMOVED	COLL
66	ID0052	ONESPIRITBOOKCLUBDEC2010	EXP	607	D1			REMOVE	NONE	COLL
67	ID0052	ONESPIRITBOOKCLUBDEC2010	TRU	616	D1			REMOVE	NONE	COLL
68	ID0054	PORSCHEX8446	EFX	659	B2	B4		ALTER	NONE	A
69	ID0054	PORSCHEX8446	EXP	714	B2	B4		ALTER	NONE	A
70	ID0054	PORSCHEX8446	TRU	693	B2	B4		ALTER	NONE	A
71	ID0057	CHASEMAR2004	EXP	638	B4			ALTER	NONE	REV
72	ID0060	ACS/NELNETEDUCATIONJAN2003	EXP	596	B4			REMOVE	NONE	ED
73	ID0060	ACSEDSERVAUGUST2,2010	EFX	640	C1			REMOVE	NONE	INQ
74	ID0060	BCSERVICESJULY2008	EXP	596	D1			REMOVE	REMOVED	COLL
75	ID0060	QVZGAUG2009	EFX	640	D1			REMOVE	NONE	COLLMED
76	ID0060	QVZGAUG2009	EXP	596	D1			REMOVE	NONE	COLLMED
77	ID0060	QVZGAUG2009	TRU	595	D1			REMOVE	REMOVED	COLLMED
78	ID0061	BOFAJUN2000	EFX	659	B1			REMOVE	REMOVED	REV
79	ID0074	CRDTFIRSTFEB2004	EXP	587	B1			REMOVE	NONE	REV
80	ID0074	CRDTFIRSTFEB2004	TRU	564	B1			REMOVE	NONE	REV
81	ID0074	CREDITFIRSTFEB2004	EFX	516	B1			REMOVE	NONE	REV
82	ID0074	MILITARYFCUFEB2004	EFX	516	B5			ALTER	NONE	A
83	ID0074	MILITARYFCUFEB2004	EXP	587	B5			ALTER	NONE	A
84	ID0074	MILITARYFCUFEB2004	TRU	564	B5			ALTER	NONE	A

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
85	ID0083	WFNTHEBUCKLEMAY2005	TRU	596	B2			ALTER	REMOVED	REV
86	ID0089	AMERICAX4661	EFX	548	B4			REMOVE	NONE	MRTG
87	ID0089	AMERICAX4661	EXP	549	B4			REMOVE	NONE	MRTG
88	ID0089	AMERICAX4661	TRU	554	B4			REMOVE	NONE	MRTG
89	ID0089	BKMARCH2005	EFX	548	E2			ALTER	AY	PR
90	ID0089	CITIFINANCIALX7735	EFX	548	B5	B7		ALTER	AP	INST
91	ID0089	CITIFINANCIALX7735	EXP	549	B8	B7		ALTER	AY	INST
92	ID0089	HSBCJULY2004	EFX	548	B7			ALTER	REMOVED	REV
93	ID0089	HSBCJULY2004	TRU	554	B7			ALTER	AY	REV
94	ID0089	INQUIRY10/2010	EXP	549	C1			REMOVE	NONE	INQ
95	ID0089	INQUIRY3/2010	EXP	549	C1			REMOVE	REMOVED	INQ
96	ID0089	INQUIRY6/2010	EXP	549	C1			REMOVE	REMOVED	INQ
97	ID0089	PORTFOLIOX9666	EFX	548	B1			REMOVE	REMOVED	TLCOLL
98	ID0089	PORTFOLIOX9666	EXP	549	B1			REMOVE	REMOVED	TLCOLL
99	ID0089	PORTFOLIOX9666	TRU	554	D1			REMOVE	REMOVED	COLL
100	ID0089	THDJULY2003	EXP	549	B4			ALTER	REMOVED	REV
101	ID0089	WELLSFARGOX2896	EFX	548	B7			ALTER	AY	A
102	ID0089	WELLSFARGOX2896	EXP	549	B4	B7		ALTER	AP	A
103	ID0089	WELLSFARGOX2896	TRU	554	B7			ALTER	REMOVED	A
104	ID0089	WFFINANCEFEB2003	EXP	549	B4			ALTER	AY	REV
105	ID0089	WFM/WBMX2095	EXP	549	B5	B4		ALTER	NONE	HEL
106	ID0091	GMACX8877	EFX	643	B5			ALTER	NONE	MRTG
107	ID0091	GMACX8877	TRU	677	B5			ALTER	NONE	MRTG
108	ID0091	NAME	EXP	675	A1			ALTER	NONE	NAME
109	ID0091	NAME	TRU	677	A1			ALTER	NONE	NAME
110	ID0094	ADDRESS	EXP	704	A1			ALTER	NONE	ADD
111	ID0094	ADDRESS	TRU	803	A1			ALTER	NONE	ADD
112	ID0094	COLL\$131DEC2005	EXP	704	D1			REMOVE	REMOVED	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
113	ID0094	WFNNB/NY&CAUG2005	EXP	704	B2			ALTER	REMOVED	REV
114	ID0095	COLLCITIBANKMAR2008	TRU	477	D1			REMOVE	REMOVED	COLL
115	ID0098	ADDRESS	EXP	532	A1			ALTER	AY	ADD
116	ID0098	USFFCUX0001	TRU	538	B5			ALTER	REMOVED	A
117	ID0104	AHFJUN2002	EFX	694	B5			ALTER	AY	A
118	ID0104	AHFJUN2002	EXP	669	B5			ALTER	AY	A
119	ID0105	SNJHEA5018	EXP	610	B4			ALTER	NONE	ED
120	ID0107	DOEX2601	EFX	542	F1			REMOVE	REMOVED	ED
121	ID0107	DOEX2601	EXP	579	F1			REMOVE	NONE	ED
122	ID0107	DOEX2601	TRU	597	F1			REMOVE	REMOVED	ED
123	ID0107	PROGRESSIVEDEC2006	EXP	579	D1			REMOVE	REMOVED	COLL
124	ID0107	PROGRESSIVEDEC2006	TRU	597	D1			REMOVE	REMOVED	COLL
125	ID0107	SOMERPOINTOCT2010	EXP	579	D1			REMOVE	NONE	COLL
126	ID0107	SOMERPOINTOCT2010	TRU	597	D1			REMOVE	REMOVED	COLL
127	ID0107	STATEOFMIX2639	EXP	579	B5			ALTER	NONE	INSTFS
128	ID0115	COLLAPJUN2005	EXP	536	D1			REMOVE	REMOVED	COLL
129	ID0115	COLLAPJUN2005	TRU	653	D1			REMOVE	REMOVED	COLL
130	ID0115	COLLBCCCAPR2009	EFX	583	D1			REMOVE	REMOVED	COLL
131	ID0115	COLLBCCCAPR2009	EXP	536	D1			REMOVE	NONE	COLL
132	ID0115	COLLBCCCAPR2009	TRU	653	D1			REMOVE	REMOVED	COLL
133	ID0115	COLLMSCJAN2010	EXP	536	D1			REMOVE	NONE	COLL
134	ID0115	COLLMSCJAN2010	TRU	653	D1			REMOVE	REMOVED	COLL
135	ID0118	COLLFTOCT2006	EFX	662	D2			REMOVE	REMOVED	COLL
136	ID0118	COLLFTOCT2006	EXP	651	D2			REMOVE	REMOVED	COLL
137	ID0119	CJX3606	TRU	689	E2			ALTER	AY	PR
138	ID0121	PREVADD	EXP	685	A1			REMOVE	REMOVED	PREVADD
139	ID0121	WFX8404	EFX	709	B4			ALTER	AY	MRTG
140	ID0121	WFX8404	EXP	685	B4			ALTER	AY	MRTG

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
141	ID0121	WFX8404	TRU	696	B4			ALTER	AY	MRTG
142	ID0127	COLL1256SEP2009	EFX	672	D1			REMOVE	NONE	COLLMED
143	ID0130	CBAGA\$12	EXP	542	B1			REMOVE	REMOVED	TLCOLL
144	ID0130	CBAGA\$15	EXP	542	B1			REMOVE	REMOVED	TLCOLL
145	ID0130	HOLLYWOOD\$109	TRU	556	D1			REMOVE	REMOVED	COLL
146	ID0130	MARRIETTA\$15	EFX	543	D1			REMOVE	REMOVED	COLL
147	ID0130	MARRIETTA\$30	EFX	543	D1			REMOVE	REMOVED	COLL
148	ID0130	MEDCOLL\$172	EFX	543	D1			REMOVE	NONE	COLLMED
149	ID0130	MEDCOLL\$172	EXP	542	D1			REMOVE	NONE	COLLMED
150	ID0130	MEDCOLL\$172	TRU	556	D1			REMOVE	REMOVED	COLLMED
151	ID0130	PRX2556	EFX	543	E2			ALTER	AY	PR
152	ID0130	PRX2556	EXP	542	E2			ALTER	AY	PR
153	ID0130	PRX2556	TRU	556	E2			ALTER	AY	PR
154	ID0130	WPGX2988	EFX	543	D1			REMOVE	REMOVED	COLL
155	ID0139	HOMESM2255DEC2003	EFX	533	B2			ALTER	REMOVED	MRTG
156	ID0139	HOMESM2255DEC2003	EXP	575	B2			ALTER	REMOVED	MRTG
157	ID0141	SPRINTDEC2007	EFX	692	D1			REMOVE	REMOVED	COLL
158	ID0144	BOFANOV2001	EXP	564	B4			ALTER	NONE	REV
159	ID0144	CHASEMAY1998	EXP	564	B4			ALTER	NONE	REV
160	ID0144	COLLMED1MAR2007	TRU	654	D1			REMOVE	REMOVED	COLLMED
161	ID0144	FUSADEC1998	EXP	564	B4			ALTER	NONE	REV
162	ID0144	GEMB/TIGERJAN2000	EFX	579	B4			ALTER	NONE	REV
163	ID0144	GEMB/TIGERJAN2000	EXP	564	B4			ALTER	NONE	REV
164	ID0144	VISADSNBMAR2008	EFX	579	B4			ALTER	NONE	REV
165	ID0144	VISADSNBMAR2008	EXP	564	B4			ALTER	NONE	REV
166	ID0146	MACYSDEC2009	EFX	740	B2			ALTER	AY	REV
167	ID0146	MACYSDEC2009	EXP	769	B2			ALTER	AY	REV
168	ID0146	MACYSDEC2009	TRU	750	B2			ALTER	REMOVED	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
169	IDO149	INQUIRIESJULY2010	TRU	627	C1			REMOVE	REMOVED	INQ
170	IDO152	CAPONEJUN2004	EFX	663	B1			REMOVE	REMOVED	REV
171	IDO152	CAPONEJUN2004	TRU	674	B1			REMOVE	REMOVED	REV
172	IDO154	CHASEJUL2005	EFX	473	B2	B6	B5	ALTER	NONE	REV
173	IDO155	COLLECTION\$121JUL2005	EFX	513	D1			REMOVE	REMOVED	COLLMED
174	IDO155	COLLECTION\$121JUL2005	EXP	555	D1			REMOVE	REMOVED	COLLMED
175	IDO155	COLLECTION\$121JUL2005	TRU	543	D1			REMOVE	REMOVED	COLLMED
176	IDO155	COLLECTION\$200FEB2005	EXP	555	D1			REMOVE	REMOVED	COLLMED
177	IDO155	COLLECTION\$200FEB2005	TRU	543	D1			REMOVE	REMOVED	COLLMED
178	IDO155	COLLECTION\$400MAR2005	EFX	513	D1			REMOVE	REMOVED	COLL
179	IDO155	COLLECTION\$400MAR2005	EXP	555	D1			REMOVE	REMOVED	COLLMED
180	IDO155	COLLECTION\$75SEP2006	EFX	513	D1			REMOVE	NONE	COLL
181	IDO155	COLLECTION\$75SEP2006	EXP	555	D1			REMOVE	NONE	COLLMED
182	IDO155	FORMERNAME	EXP	555	A1			REMOVE	REMOVED	FRMNAME
183	IDO155	FORMERNAME	TRU	543	A1			REMOVE	REMOVED	FRMNAME
184	IDO155	MAINSTCORPNOV2009	EFX	513	B1	D1		REMOVE	AP	TLCOLL
185	IDO155	MAINSTCORPNOV2009	EXP	555	B1	D1		REMOVE	REMOVED	TLCOLL
186	IDO155	PRCASENO.40168JUL2005	EXP	555	E1			REMOVE	REMOVED	PR
187	IDO156	COLLECTION\$105JAN2008	EXP	675	D1			REMOVE	REMOVED	COLLMED
188	IDO156	COLLECTION\$105JAN2008	TRU	671	D1			REMOVE	REMOVED	COLLMED
189	IDO163	CHASE	TRU	590	B2	B5		ALTER	REMOVED	REV
190	IDO163	CITBMLINQJUN2010	EFX	635	C1			REMOVE	REMOVED	INQ
191	IDO163	MERITECHSAXON8166	EFX	635	B4	B5		ALTER	AY	MRTG
192	IDO163	MERITECHSAXON8166	EXP	675	B4			ALTER	AY	MRTG
193	IDO163	SST/COL5427	EFX	635	B2	B4	B5	ALTER	REMOVED	A
194	IDO163	SST/COL5427	EXP	675	B4	B5		ALTER	NONE	REV
195	IDO163	SST/COL5427	TRU	590	B2	B4	B5	ALTER	NONE	REV
196	IDO164	TLAUG1993	EFX	525	E1			REMOVE	NONE	PR



**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
197	ID0167	COLLECTIONWFNAPR2010	EXP	594	D1			REMOVE	REMOVED	COLL
198	ID0167	COLLECTIONWFNAPR2010	TRU	527	D1			REMOVE	REMOVED	COLL
199	ID0167	INQUIRYCITMNLJUL2010	EFX	501	C1			REMOVE	REMOVED	INQ
200	ID0167	INQUIRYRPMJUL2010	TRU	527	C1			REMOVE	REMOVED	INQ
201	ID0167	INQUIRYSPRNGLFFINMAR2011	EFX	501	C1			REMOVE	NONE	INQ
202	ID0169	BACHOMELNSX7603	EFX	567	B4	B6	B5	ALTER	NONE	MRTG
203	ID0169	BACHOMELNSX7603	EXP	471	B4	B6	B5	ALTER	NONE	MRTG
204	ID0169	BACHOMELNSX7603	TRU	497	B4	B6	B5	ALTER	NONE	MRTG
205	ID0169	PINNACLEAUG2009	EFX	567	B1			REMOVE	REMOVED	TLCOLL
206	ID0171	WFNNB/RMPLJAN2003	EFX	804	B7			ALTER	REMOVED	REV
207	ID0174	COLLFEB2009\$216	EXP	638	B5	D3		ALTER	AY	TLCOLL
208	ID0174	COLLJAN2009\$112	EXP	638	B5	D3		ALTER	AY	TLCOLL
209	ID0174	COLLJAN2009\$1348	EXP	638	B5	D3		ALTER	AY	TLCOLL
210	ID0174	COLLJAN2009\$54	EXP	638	B5	D3		ALTER	AY	TLCOLL
211	ID0174	COLLJUL2008\$215	EXP	638	B5	D3		ALTER	AY	TLCOLL
212	ID0174	MEDCOLLDEC2008	EFX	599	D3			ALTER	REMOVED	COLLMED
213	ID0174	MEDCOLLDEC2008	EXP	638	B5	D3		ALTER	AY	TLCOLL
214	ID0174	MEDCOLLFEB2009	TRU	637	D3			ALTER	REMOVED	COLLMED
215	ID0174	MEDIACOMCOLL	EFX	599	D3			ALTER	REMOVED	COLL
216	ID0174	MEDIACOMCOLL	TRU	637	D3			ALTER	REMOVED	COLL
217	ID0179	DIRECTVMAY2008	EFX	688	D1			REMOVE	NONE	COLL
218	ID0182	INQUIRYSTERLING	EFX	471	C1			REMOVE	REMOVED	INQ
219	ID0191	LVNVAUG2008	EFX	489	D1	B1		REMOVE	NONE	TLCOLL
220	ID0191	LVNVAUG2008	EXP	510	B1	D1		REMOVE	NONE	TLCOLL
221	ID0191	LVNVAUG2008	TRU	531	B1	D1		REMOVE	NONE	TLCOLL
222	ID0192	INQBARCLAYS	TRU	628	C1			REMOVE	NONE	INQ
223	ID0193	AMEXMAR\$1683	EFX	706	F1			REMOVE	REMOVED	REV
224	ID0193	AMEXMAR\$1683	EXP	748	F1			REMOVE	NONE	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
225	ID0193	AMEXMAR\$1683	TRU	723	F1			REMOVE	REMOVED	REV
226	ID0193	AMEXMAR\$286	TRU	723	F1			REMOVE	NONE	REV
227	ID0193	AMEXMAR\$817	EFX	706	F1			REMOVE	REMOVED	REV
228	ID0193	AMEXMAR\$817	TRU	723	F1			REMOVE	NONE	REV
229	ID0193	BOFAMAR2005	TRU	723	F1			REMOVE	NONE	REV
230	ID0193	MACYSMAY2007	EFX	706	F1			REMOVE	NONE	REV
231	ID0193	MACYSMAY2007	EXP	748	F1			REMOVE	NONE	REV
232	ID0193	MACYSMAY2007	TRU	723	F1			REMOVE	NONE	REV
233	ID0193	MAYCSAUGUST2004	EFX	706	F1			REMOVE	NONE	REV
234	ID0193	MAYCSAUGUST2004	EXP	748	F1			REMOVE	NONE	REV
235	ID0193	MAYCSAUGUST2004	TRU	723	F1			REMOVE	NONE	REV
236	ID0193	NAME	TRU	723	A1			ALTER	NONE	NAME
237	ID0194	VWCREDITMARCH2022	EFX	631	B2	B6	B5	ALTER	AY	A
238	ID0194	VWCREDITMARCH2022	TRU	641	B5	B4		ALTER	AY	A
239	ID0204	BARCLAYSBKDEC2008	EFX	580	B1			REMOVE	REMOVED	REV
240	ID0205	CAPONEOCT2004	EFX	496	B2	B6		ALTER	NONE	REV
241	ID0205	CAPONEOCT2004	TRU	535	B2	B6		ALTER	NONE	REV
242	ID0205	CHASEJAN2006	EFX	496	B1			REMOVE	REMOVED	REV
243	ID0205	CHASEJAN2006	TRU	535	B1			REMOVE	REMOVED	REV
244	ID0205	CURRADD	EFX	496	A1			REMOVE	NONE	CURADD
245	ID0205	CURRADD	TRU	535	A1			REMOVE	NONE	CURADD
246	ID0205	FRMRNAME	EFX	496	A1			REMOVE	REMOVED	FRMNAME
247	ID0205	NAME	TRU	535	A1			REMOVE	NONE	NAME
248	ID0205	SPRINTCOLLFEB2010	EFX	496	F4			REMOVE	NONE	COLL
249	ID0205	SST/CIGPFLJAN2006	EFX	496	F1			REMOVE	NONE	TLCOLL
250	ID0205	SST/CIGPFLJAN2006	TRU	535	F1			REMOVE	AP	TLCOLL
251	ID0205	SSTCOLUMBJAN2006	EFX	496	F1			REMOVE	AP	REV
252	ID0205	SSTCOLUMBJAN2006	TRU	535	F1			REMOVE	AP	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
253	ID0209	BLMDSSEP2000	EXP	763	B1			REMOVE	NONE	REV
254	ID0209	BOFAJUL2007	EXP	763	B1			REMOVE	REMOVED	REV
255	ID0209	CBFEB2010	EXP	763	B1			REMOVE	REMOVED	REV
256	ID0209	DFSJAN2007	EXP	763	B1			REMOVE	REMOVED	REV
257	ID0209	EMPL	EXP	763	A2			REMOVE	REMOVED	EMPL
258	ID0209	FMBDEC2001	EXP	763	B1			REMOVE	REMOVED	INST
259	ID0209	FNAMEADD	EXP	763	A1			REMOVE	REMOVED	FNAMECURRA
260	ID0209	HSBCFEB2006	EXP	763	B1			REMOVE	REMOVED	REV
261	ID0209	HSBCSEP2003	EXP	763	B1			REMOVE	REMOVED	REV
262	ID0209	RNB-FIELDS	EXP	763	B1			REMOVE	REMOVED	REV
263	ID0213	PFCU	EFX	693	B4			ALTER	NONE	MRTG
264	ID0213	PFCU	EXP	728	B4			ALTER	NONE	MRTG
265	ID0213	PFCU	TRU	675	B4			ALTER	NONE	MRTG
266	ID0214	CAPONEJUL2004	TRU	577	B4			ALTER	NONE	REV
267	ID0214	CURRADD	EFX	596	A1			ALTER	NONE	CURADD
268	ID0214	CURRADD	TRU	577	A1			ALTER	NONE	CURADD
269	ID0214	FEDLOANX0001	EFX	596	B4			ALTER	NONE	ED
270	ID0214	FEDLOANX0001	EXP	634	B4			ALTER	NONE	ED
271	ID0214	FEDLOANX0001	TRU	577	B4			ALTER	NONE	ED
272	ID0214	NATIONWIDECOLLJAN2008	TRU	577	D1			REMOVE	NONE	COLL
273	ID0215	BOFAJAN2006	EFX	661	B2	B4		ALTER	AY	A
274	ID0215	BOFAJAN2006	TRU	672	B2	B4		ALTER	AY	A
275		SMDEC2007	TRU	613	B4			ALTER	UNKNOWN	ED
276		SMMAR2007	EFX	622	B4			ALTER	UNKNOWN	ED
277	ID0217	BOFAMAR1990	EFX	706	B1			REMOVE	REMOVED	REV
278	ID0217	BOFAMAR1990	EXP	761	B1			REMOVE	REMOVED	REV
279	ID0217	BOFAMAR1990	TRU	733	B1			REMOVE	NONE	REV
280	ID0217	PREVADD4280	EFX	706	A1			REMOVE	REMOVED	PREADD

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
281	ID0217	PREVADD4280	EXP	761	A1			REMOVE	REMOVED	PREADD
282	ID0217	PREVADD4280	TRU	733	A1			REMOVE	REMOVED	PREADD
283	ID0217	PREVADD4837	EFX	706	A1			REMOVE	REMOVED	PREADD
284	ID0217	PREVADD4837	EXP	761	A1			REMOVE	REMOVED	PREADD
285	ID0217	PREVADD4837	TRU	733	A1			REMOVE	REMOVED	PREADD
286	ID0221	CHASE-CHASEP2010	EXP	734	C1			REMOVE	NONE	INQ
287	ID0226	AMEXX1843	TRU	754	B2			ALTER	REMOVED	REV
288	ID0226	CURRADD	EXP	761	A1			REMOVE	REMOVED	CURRADD
289	ID0226	PREVADD15	EFX	760	A1			REMOVE	REMOVED	PREADD
290	ID0226	PREVADD15	TRU	754	A1			REMOVE	REMOVED	PREADD
291	ID0226	PREVADD214	TRU	754	A1			REMOVE	REMOVED	PREADD
292	ID0226	PREVADD69	EFX	760	A1			REMOVE	NONE	PREADD
293	ID0231	BCINSTMAY2007	EXP	664	B4			ALTER	NONE	INST
294	ID0231	CBAUG2001	EXP	664	B4			ALTER	AD	REV
295	ID0231	FNAMEPREADD	EXP	664	A1			REMOVE	NONE	FNAMEADD
296	ID0231	HSMRTG	EXP	664	B4			ALTER	NONE	MRTG
297	ID0231	PREVADD	EFX	651	A1			REMOVE	NONE	PREADD
298	ID0231	SANTANDERAUG2006	EXP	664	B4			ALTER	REMOVED	A
299	ID0231	WFALNOV2007	EXP	664	B4			ALTER	NONE	A
300	ID0233	USBANKOCT2007	EFX	715	B20			ALTER	NONE	REV
301	ID0233	USBANKOCT2007	EXP	734	B20			ALTER	NONE	REV
302	ID0233	USBANKOCT2007	TRU	725	B20			ALTER	NONE	REV
303	ID0233	WSUSL	EXP	734	B2			ALTER	REMOVED	ED
304	ID0234	ALLIANCEONEOCT2007	EXP	672	D1			REMOVE	REMOVED	COLL
305	ID0234	ALLIANCEONEOCT2007	TRU	644	D1			REMOVE	REMOVED	COLL
306	ID0234	NCOFIN22COLLAUG2009	EFX	570	B1			REMOVE	UNKNOWN	TLCOLL
307	ID0234	NCOFIN22COLLAUG2009	EXP	672	D1			REMOVE	REMOVED	COLL
308	ID0234	NCOFIN22COLLAUG2009	TRU	644	D1			REMOVE	REMOVED	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
309	ID0242	AKSTLOANX0002	EFX	656	B4	B5		ALTER	REMOVED	ED
310	ID0242	AKSTLOANX0003	EFX	656	B4	B5		ALTER	REMOVED	ED
311	ID0242	AKSTLOANX0004	EFX	656	B4	B5		ALTER	REMOVED	ED
312	ID0242	AKSTLOANX0005	EFX	656	B4	B5		ALTER	REMOVED	ED
313	ID0242	WELLSFARGOX0001	TRU	684	B5			ALTER	REMOVED	INST
314	ID0246	MRTGAPR2004STATUS	EFX	707	B5			ALTER	NONE	MRTG
315	ID0246	OLSMRTGAPR2004	EXP	718	B5	B4		ALTER	AP	MRTG
316	ID0250	COLLFCOCT2010	EFX	649	D1			REMOVE	NONE	COLL
317	ID0250	COLLFCOCT2010	EXP	624	D1			REMOVE	NONE	COLL
318	ID0250	COLLFCOCT2010	TRU	623	D1			REMOVE	NONE	COLL
319	ID0253	AT&TINQ	EFX	711	C1			REMOVE	REMOVED	INQ
320	ID0253	LVNVNOV2007	EFX	711	B1	D1		REMOVE	REMOVED	TLCOLL
321	ID0253	LVNVNOV2007	EXP	754	B1	D1		REMOVE	NONE	TLCOLL
322	ID0253	LVNVNOV2007	TRU	706	B1	D1		REMOVE	NONE	TLCOLL
323	ID0253	NAME	EFX	711	A1			ALTER	AY	NAME
324	ID0255	COLLMED102	TRU	743	D1			REMOVE	REMOVED	COLLMED
325	ID0255	GEL&T	EXP	728	B1			REMOVE	REMOVED	REV
326	ID0255	GEL&T	TRU	743	B1			REMOVE	REMOVED	REV
327	ID0260	BOFAMARCH2003	EXP	728	B4			ALTER	NONE	REV
328	ID0260	BOFAOCT2002	EXP	728	B4			ALTER	NONE	REV
329	ID0260	CHASEJAN1994	EXP	728	B1			REMOVE	REMOVED	REV
330	ID0262	HSBCJUNE2007	EFX	763	B1			REMOVE	REMOVED	REV
331	ID0262	HSBCJUNE2007	EXP	768	B1			REMOVE	REMOVED	REV
332	ID0262	HSBCJUNE2007	TRU	767	B1			REMOVE	REMOVED	REV
333	ID0262	PREVADD13800	EXP	768	A1			REMOVE	REMOVED	PREADD
334	ID0262	PREVADD13800	TRU	767	A1			REMOVE	REMOVED	PREADD
335	ID0262	PREVADD3240	EFX	763	A1			REMOVE	REMOVED	PREADD
336	ID0262	PREVADD3240	EXP	768	A1			REMOVE	NONE	PREADD

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
337	ID0262	PREVADD3240	TRU	767	A1			REMOVE	REMOVED	PREADD
338	ID0262	WFOCT2008	EFX	763	B1			REMOVE	REMOVED	REV
339	ID0262	WFOCT2008	TRU	767	B1			REMOVE	NONE	REV
340	ID0271	LORCH	EFX	640	B8			REMOVE	REMOVED	REV
341	ID0274	BACHOMELOANSX5486	EFX	523	B5			ALTER	NONE	MRTG
342	ID0274	BACHOMELOANSX5494	EFX	523	B2	B5	B6	ALTER	AP	MRTG
343	ID0274	BACHOMELOANSX5494	EXP	559	B2	B5	B6	ALTER	AP	MRTG
344	ID0274	BACHOMELOANSX5494	TRU	547	B2	B5	B6	ALTER	AP	MRTG
345	ID0274	BOFAAPR2005	EFX	523	B5			ALTER	NONE	REV
346	ID0274	BOFAAPR2005	TRU	547	B5			ALTER	AY	REV
347	ID0274	BOFAAUG2007	EFX	523	B5			ALTER	AY	REV
348	ID0274	BOFAAUG2007	TRU	547	B5			ALTER	NONE	REV
349	ID0274	WEENERGIESAPR2009	EFX	523	D1			ALTER	NONE	COLL
350	ID0274	WEENERGIESAPR2009	EXP	559	D2			ALTER	REMOVED	COLL
351	ID0274	WEENERGIESAPR2009	TRU	547	D2			ALTER	REMOVED	COLL
352	ID0274	WELLSFARGOCT2005	EFX	523	B1			REMOVE	NONE	INST
353	ID0274	WELLSX0001	EFX	523	B2	B5	B6	ALTER	REMOVED	ED
354	ID0275	BOFA8724	EXP	488	D1			REMOVE	REMOVED	COLL
355	ID0275	BOFA8724	TRU	480	D1			REMOVE	NONE	COLL
356	ID0275	COPPING	TRU	480	D1			REMOVE	NONE	COLL
357	ID0278	ADD	EXP	658	A1			ALTER	NONE	CURADD
358	ID0278	CURRADD1711	EFX	640	A1			REMOVE	NONE	CURADD
359	ID0278	CURRADD1711	EXP	658	A1			REMOVE	NONE	CURADD
360	ID0278	CURRADD1711	TRU	619	A1			REMOVE	NONE	CURADD
361	ID0278	NCCINQUIRY	TRU	619	C1			REMOVE	NONE	INQ
362	ID0283	COLL6363	EFX	573	D1			REMOVE	NONE	COLLMED
363	ID0283	COLL6363	EXP	587	D1			REMOVE	NONE	COLLMED
364	ID0283	COLL6363	TRU	597	D1			REMOVE	REMOVED	COLLMED

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
365	ID0283	COLLJUL2007	EFX	573	D1			REMOVE	REMOVED	COLLMED
366	ID0283	COLLJUL2007	EXP	587	D1			REMOVE	NONE	COLLMED
367	ID0283	COLLJUL2007	TRU	597	D1			REMOVE	REMOVED	COLLMED
368	ID0284	MDOFCS	TRU	576	B2	B6	B5	ALTER	AY	OBLTLCOLL
369	ID0290	CHASE4686	EFX	687	B5			ALTER	NONE	MRTG
370	ID0290	CHASE4686	EXP	669	B5			ALTER	NONE	MRTG
371	ID0291	AMERICREDIT	EXP	581	B4			ALTER	AY	A
372	ID0291	CAPONEAUG2003	EXP	581	B4			ALTER	AY	REV
373	ID0291	CAPONEDEC2004	EXP	581	B4			ALTER	AY	REV
374	ID0291	CHASESEP2004	EXP	581	B4			ALTER	AY	REV
375	ID0291	COLLMPD	EXP	581	D1			REMOVE	REMOVED	COLLMED
376	ID0291	GEMBAUG2005	EFX	664	B8	B6	B2	ALTER	AY	REV
377	ID0291	GEMBAUG2005	EXP	581	B4			ALTER	AY	REV
378	ID0291	IBERIABANK	EXP	581	B4	B6		ALTER	AY	HEL
379	ID0291	MRTG4006APR1997	EFX	664	B4			ALTER	REMOVED	MRTG
380	ID0291	MRTG4006APR1997	EXP	581	B4			ALTER	AY	MRTG
381	ID0291	MRTG4006APR1997	TRU	664	B4			ALTER	AY	MRTG
382	ID0294	ADELPHIAX6079	EFX	532	D1			REMOVE	REMOVED	COLL
383	ID0294	ADELPHIAX6079	EXP	514	D1			REMOVE	REMOVED	COLL
384	ID0294	CENTURYLINK	EFX	532	D1			REMOVE	NONE	COLL
385	ID0294	CENTURYLINK	EXP	514	D1			REMOVE	NONE	COLL
386	ID0294	CENTURYLINK	TRU	569	D1			REMOVE	NONE	COLL
387	ID0294	COLLECTION\$4153	EFX	532	D1			REMOVE	NONE	COLL
388	ID0294	COLLECTION\$4153	TRU	569	D1			REMOVE	NONE	COLL
389	ID0294	COXX1704	EFX	532	D1			REMOVE	NONE	COLL
390	ID0294	COXX1704	EXP	514	D1			REMOVE	NONE	COLL
391	ID0294	COXX1705	EFX	532	D1			REMOVE	NONE	COLL
392	ID0294	COXX1705	EXP	514	D1			REMOVE	NONE	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
393	ID0294	INDIANTRACE	EXP	514	D1			REMOVE	REMOVED	COLL
394	ID0294	INDIANTRACE	TRU	569	D1			REMOVE	REMOVED	COLL
395	ID0294	LAMONTHANLEY	EXP	514	B1			REMOVE	NONE	TLCOLL
396	ID0294	USAFUNDS1X7062	EFX	532	B1			REMOVE	NONE	TLCOLL
397	ID0294	USAFUNDS1X7062	EXP	514	B1			REMOVE	NONE	TLCOLL
398	ID0294	USAFUNDS1X7062	TRU	569	B1			REMOVE	NONE	TLCOLL
399	ID0294	USAFUNDS2X7062	EFX	532	B1			REMOVE	NONE	TLCOLL
400	ID0294	USAFUNDS2X7062	EXP	514	B1			REMOVE	NONE	TLCOLL
401	ID0294	USAFUNDS2X7062	TRU	569	B1			REMOVE	NONE	TLCOLL
402	ID0298	FNAME	TRU	597	A1			REMOVE	REMOVED	FRMNAME
403	ID0298	INQAT&T	EFX	610	C1			REMOVE	REMOVED	INQ
404	ID0298	INQFACTUAL	EFX	610	C1			REMOVE	REMOVED	INQ
405	ID0298	PREADD	EFX	610	A1			REMOVE	NONE	PREADD
406	ID0299	VILLAGEOFNORTMAY2009	EFX	668	D1			REMOVE	NONE	COLL
407	ID0299	VILLAGEOFNORTMAY2009	TRU	641	D1			REMOVE	NONE	COLL
408	ID0300	NEXTCARDMAY2001	TRU	618	B2			ALTER	REMOVED	REV
409	ID0304	CHASENOV1998	EFX	712	B1			REMOVE	REMOVED	REV
410	ID0304	CHASENOV1998	EXP	719	B1			REMOVE	REMOVED	REV
411	ID0304	CHASENOV1998	TRU	704	B1			REMOVE	REMOVED	REV
412	ID0304	PROGMARCH2006	EXP	719	D1			REMOVE	NONE	COLLMED
413	ID0304	PROGMARCH2006	TRU	704	D1			REMOVE	NONE	COLLMED
414	ID0306	CURADD	EXP	790	A1			ALTER	UNKNOWN	CURADD
415	ID0306	NAME	EXP	790	A1			ALTER	UNKNOWN	NAME
416	ID0306	NAME	TRU	776	A1			ALTER	UNKNOWN	NAME
417	ID0306	PREADD	EXP	790	A1			REMOVE	UNKNOWN	PREADD
418	ID0306	PREADD	TRU	776	A1			REMOVE	UNKNOWN	PREADD
419	ID0308	BOFAFEB2005	EFX	584	B2			ALTER	UNKNOWN	REV
420	ID0308	BOFAFEB2005	EXP	549	B2			ALTER	AY	REV



**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
421	ID0308	BOFAFEB2005	TRU	545	B2			ALTER	AY	REV
422	ID0308	COLLMAR2006	EFX	584	D1			REMOVE	UNKNOWN	COLLMED
423	ID0308	GMAC1648	EFX	584	B4			ALTER	UNKNOWN	MRTG
424	ID0308	GMAC1648	EXP	549	B4			ALTER	AY	MRTG
425	ID0308	GMAC1648	TRU	545	B4			ALTER	NONE	MRTG
426	ID0308	INQKOHLS	EXP	549	C1			REMOVE	REMOVED	INQ
427	ID0308	INQORCS	EFX	584	C1			REMOVE	UNKNOWN	INQ
428	ID0308	INQVENGROFF	EXP	549	C1			REMOVE	NONE	INQ
429	ID0308	PREADD	EFX	584	A1			REMOVE	UNKNOWN	PREADD
430	ID0308	PREADD	EXP	549	A1			REMOVE	NONE	PREADD
431	ID0308	PREADD	TRU	545	A1			REMOVE	REMOVED	PREADD
432	ID0308	PRTL	TRU	545	E2			REMOVE	AY	PR
433	ID0321	BHLS7564	EFX	734	B4			ALTER	AY	MRTG
434	ID0321	BHLS7564	EXP	759	B4			ALTER	AY	MRTG
435	ID0321	BHLS7564	TRU	743	B4			ALTER	AY	MRTG
436	ID0322	CURRADD	TRU	598	A1			ALTER	AY	CURADD
437	ID0322	FPBAN2008	EXP	580	B4			ALTER	REMOVED	REV
438	ID0328	COLLCPPE	TRU	678	D1			REMOVE	NONE	COLL
439	ID0331	COLLDCSEP2010	EXP	684	D1			REMOVE	NONE	COLL
440	ID0331	COLLDCSEP2010	TRU	692	D1			REMOVE	NONE	COLL
441	ID0331	COLLDEC2008	EFX	697	D1			REMOVE	NONE	COLLMED
442	ID0331	COLLDEC2008	EXP	684	D1			REMOVE	NONE	COLLMED
443	ID0331	COLLDEC2008	TRU	692	D1			REMOVE	REMOVED	COLLMED
444	ID0332	1STDATAJULY2003	EFX	631	B2	B5	B6	ALTER	NONE	INST
445	ID0332	PREVADDWELLS	EFX	631	A1			REMOVE	NONE	PREADD
446	ID0338	CHASEMAR2003	EFX	529	B2	B5		ALTER	NONE	REV
447	ID0338	CHASEMAR2003	EXP	541	B2	B5		ALTER	NONE	REV
448	ID0338	CHASEMAR2003	TRU	580	B2	B5		ALTER	NONE	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
449	ID0338	WFDS1085	EFX	529	B2			ALTER	NONE	A
450	ID0338	WFDS1085	EXP	541	B2			ALTER	NONE	A
451	ID0338	WFDS1085	TRU	580	B2			ALTER	NONE	A
452	ID0344	AACNOV2010	EFX	490	B1	D1		REMOVE	NONE	TLCOLL
453	ID0344	AACNOV2010	EXP	532	B1			REMOVE	NONE	TLCOLL
454	ID0344	CITIFINANCIALSEP2000	TRU	506	B5			ALTER	NONE	A
455	ID0344	FHUT/METBKCOCT2007	EFX	490	B1			REMOVE	NONE	REV
456	ID0344	TAXLIEN0750	TRU	506	E2			REMOVE	NONE	PR
457	ID0344	TAXLIEN9545	TRU	506	E2			REMOVE	NONE	PR
458	ID0344	THD/CBSDLFEB2007	EFX	490	B1			REMOVE	NONE	REV
459	ID0344	THD/CBSDLFEB2007	EXP	532	B1			REMOVE	NONE	REV
460	ID0344	THD/CBSDLFEB2007	TRU	506	B1			REMOVE	NONE	REV
461	ID0344	VERIZONOCT2005	EXP	532	B2			ALTER	REMOVED	REV
462	ID0348	AMEXDEC2010	EXP	575	C1			REMOVE	NONE	INQ
463	ID0348	BACHOMELOANSSERVICINGAUGUST1996	TRU	592	B1			REMOVE	REMOVED	MRTG
464	ID0348	CONSUMERCREDITSCVSDDEC2005	TRU	592	B1			REMOVE	REMOVED	REV
465	ID0348	EMPLOYFD	TRU	592	A2			REMOVE	REMOVED	EMP
466	ID0348	GEMBWALMARTJUN2006	TRU	592	B1			REMOVE	REMOVED	REV
467	ID0348	HSBCAUTOFINFEB2002	TRU	592	B1			REMOVE	REMOVED	A
468	ID0348	HSBCAUTOFINMAR2004	TRU	592	B1			REMOVE	REMOVED	A
469	ID0348	HSBCBANKSEPT2003	TRU	592	B1			REMOVE	REMOVED	REV
470	ID0348	NAME	EXP	575	A1			ALTER	NONE	A1
471	ID0348	NAME	TRU	592	A1			ALTER	NONE	A1
472	ID0348	NCOFIN/99	EXP	575	D1			REMOVE	REMOVED	COLLMED
473	ID0348	PREADDHYATT	TRU	592	A1			REMOVE	REMOVED	PREADD
474	ID0348	PRIMUSFINANCIALSERVICEDEC1997	TRU	592	B1			REMOVE	NONE	A
475	ID0349	CITIX9001	EFX	737	B2	B7		ALTER	REMOVED	A
476	ID0349	CITIX9001	EXP	653	B2	B7		ALTER	AY	A

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
477	ID0349	CITIX9001	TRU	659	B2	B7		ALTER	REMOVED	A
478	ID0349	GREENTREEX7108	TRU	659	B1			REMOVE	REMOVED	A
479	ID0350	BOFAMORTG2523	EFX	600	B5	B6		ALTER	AD	MRTG
480	ID0350	BOFAMORTG2523	EXP	638	B5	B6		ALTER	AD	MRTG
481	ID0350	BOFAMORTG2523	TRU	597	B5	B6		ALTER	AD	MRTG
482	ID0350	FCU1600	EFX	600	B2	B5	B6	ALTER	NONE	INST
483	ID0350	FCU1600	EXP	638	B2	B5	B6	ALTER	NONE	INST
484	ID0350	FCU1600	TRU	597	B2	B5	B6	ALTER	AY	INST
485	ID0350	MARINERFIN	EFX	600	B2	B4	B5	ALTER	NONE	INST
486	ID0350	NOTE	EFX	600	G2			ALTER	NONE	NOTE
487	ID0350	NOTE	EXP	638	G2			ALTER	NONE	NOTE
488	ID0350	NOTE	TRU	597	G1			ALTER	NONE	NOTE
489	ID0350	STATEFRM0001	EFX	600	B5	B6	B2	ALTER	NONE	A
490	ID0350	STATEFRM0001	EXP	638	B2	B5	B6	ALTER	AP	A
491	ID0350	STATEFRM0001	TRU	597	B2	B5	B6	ALTER	AY	A
492	ID0352	WFNNB/NYC&C	EFX	700	B4			ALTER	REMOVED	REV
493	ID0352	WFNNB/NYC&C	EXP	765	B4			ALTER	REMOVED	REV
494	ID0352	WFNNB/NYC&C	TRU	715	B4			ALTER	REMOVED	REV
495	ID0356	AARONS\$1174	TRU	552	D1			REMOVE	NONE	COLL
496	ID0356	AARONS\$2242	TRU	552	D1			REMOVE	NONE	COLL
497	ID0356	AARONS\$2671	TRU	552	D1			REMOVE	NONE	COLL
498	ID0356	AMERICASH\$1964	EXP	508	D1			REMOVE	NONE	COLL
499	ID0356	AMERICASH\$1964	TRU	552	D1			REMOVE	NONE	COLL
500	ID0356	CURPREADD	EFX	561	A1			ALTER	AY	ADD
501	ID0356	FPBAUG2009	EFX	561	B1			REMOVE	REMOVED	REVCC
502	ID0356	FPBAUG2009	EXP	508	B1			REMOVE	REMOVED	REV
503	ID0356	FPBAUG2009	TRU	552	B1			REMOVE	REMOVED	REV
504	ID0356	JAN2007\$375	TRU	552	D1			REMOVE	REMOVED	COLLMED

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
505	ID0356	JUL2005\$882	TRU	552	D1			REMOVE	REMOVED	COLLMED
506	ID0356	JUN2005\$110	TRU	552	D1			REMOVE	REMOVED	COLLMED
507	ID0356	OCT2009\$546	TRU	552	D1			REMOVE	NONE	COLLMED
508	ID0356	OCT2010\$1174	EFX	561	B1	D1		REMOVE	NONE	TLCOLLMED
509	ID0356	OCT2010\$2242	EFX	561	B1	D1		REMOVE	NONE	TLCOLL
510	ID0356	OCT2010\$2671	EFX	561	B1	D1		REMOVE	REMOVED	TLCOLL
511	ID0356	PAYLIANCE50	EXP	508	D1			REMOVE	REMOVED	COLL
512	ID0356	UNKN\$110	EFX	561	B1	D1		REMOVE	REMOVED	TLCOLLMED
513	ID0356	UNKN\$160	EFX	561	B1	D1		REMOVE	NONE	TLCOLLMED
514	ID0356	UNKN\$375	EFX	561	B1	D1		REMOVE	NONE	TLCOLLMED
515	ID0356	UNKN\$419	EFX	561	B1	D1		REMOVE	REMOVED	TLCOLL
516	ID0356	UNKN\$546	EFX	561	B1	D1		REMOVE	NONE	TLCOLLMED
517	ID0356	UNKN\$882	EFX	561	B1	D1		REMOVE	NONE	TLCOLLMED
518	ID0358	BOFAMRTG6528	EFX	600	B4			ALTER	NONE	MRTG
519	ID0358	BOFAMRTG6528	EXP	596	B4			ALTER	NONE	MRTG
520	ID0358	BOFAMRTG6528	TRU	601	B4			ALTER	NONE	MRTG
521	ID0370	COLL1072	EXP	576	D1			REMOVE	REMOVED	COLL
522	ID0370	INQDEC182010	TRU	623	C1			REMOVE	REMOVED	INQ
523	ID0370	INQJAN202010	EFX	525	C1			REMOVE	REMOVED	INQ
524	ID0370	INQMAR22010	EXP	576	C1			REMOVE	REMOVED	INQ
525	ID0370	INQSEP202010	EXP	576	C1			REMOVE	NONE	INQ
526	ID0372	DISCOCT1995	EFX	627	B1			REMOVE	NONE	REV
527	ID0372	DISCOCT1995	EXP	624	B1			REMOVE	NONE	REV
528	ID0372	DISCOCT1995	TRU	647	B1			REMOVE	NONE	REV
529	ID0373	AT&TFEB2005	EFX	566	B1			REMOVE	REMOVED	REV
530	ID0373	COLL\$150	EXP	536	D1			REMOVE	NONE	COLLMED
531	ID0373	COLL\$178	EXP	536	D1			REMOVE	NONE	COLL
532	ID0373	COLL\$178	TRU	537	D1			REMOVE	NONE	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
533	ID0373	COLL\$187	EXP	536	D1			REMOVE	NONE	COLL
534	ID0373	COLL\$187	TRU	537	D1			REMOVE	NONE	COLL
535	ID0373	COLL\$221	EFX	566	D4			ALTER	REMOVED	COLLMED
536	ID0373	COLL\$221	EXP	536	D4			ALTER	NONE	COLLMED
537	ID0373	COLL\$221	TRU	537	D4			ALTER	REMOVED	COLLMED
538	ID0373	COLL\$357	EFX	566	D4			ALTER	REMOVED	COLLMED
539	ID0373	COLL\$357	EXP	536	D4			ALTER	NONE	COLLMED
540	ID0373	COLL\$357	TRU	537	D4			ALTER	REMOVED	COLLMED
541	ID0373	COLL\$546	TRU	537	D1			REMOVE	AY	COLL
542	ID0373	FRMNAME	EXP	536	A1			REMOVE	NONE	FRMNAME
543	ID0373	FRMNAME	TRU	537	A1			REMOVE	NONE	FRMNAME
544	ID0373	NAME	EFX	566	A1			ALTER	NONE	NAME
545	ID0373	NAME	EXP	536	A1			ALTER	NONE	NAME
546	ID0373	NAME	TRU	537	A1			ALTER	NONE	NAME
547	ID0373	TRIBUTEAPR2008	EFX	566	B1			REMOVE	REMOVED	REV
548	ID0373	TRIBUTEAPR2008	EXP	536	B1			REMOVE	REMOVED	REV
549	ID0373	TRIBUTEAPR2008	TRU	537	B1			REMOVE	REMOVED	REV
550	ID0373	UBSJUN2008	TRU	537	B1			REMOVE	NONE	INST
551	ID0373	VERIZONSEP2007	EFX	566	B1			REMOVE	REMOVED	REV
552	ID0373	VERIZONSEP2007	EXP	536	B1			REMOVE	NONE	REV
553	ID0373	VERIZONSEP2007	TRU	537	B1			REMOVE	NONE	REV
554	ID0377	COLLKNOL	EFX	559	D3			ALTER	NONE	COLL
555	ID0377	COLLKNOL	EXP	510	D3			ALTER	NONE	COLL
556	ID0377	COLLKNOL	TRU	479	D3			ALTER	NONE	COLL
557	ID0386	COLLGMAC2007	EFX	597	D1			REMOVE	NONE	COLL
558	ID0386	COLLGMAC2008	EFX	597	D1			REMOVE	NONE	COLL
559	ID0392	INQJUL2010	EFX	576	C1			REMOVE	REMOVED	INQ
560	ID0401	VERITASSEP2002	EFX	566	B2	B6		ALTER	NONE	INST

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
561	ID0401	VERITASSEP2002	EXP	535	B2	B6		ALTER	NONE	INST
562	ID0402	COLLMAR2007	EXP	644	D1	F4		REMOVE	REMOVED	COLLMED
563	ID0403	CURRPREADD	TRU	614	A1			ALTER	AY	CURADD
564	ID0403	USWINMAY2004	EFX	638	B7			ALTER	AY	U
565	ID0403	USWINMAY2004	TRU	614	B7			ALTER	REMOVED	REV
566	ID0405	AT&TJUL2001	EFX	686	B5			ALTER	NONE	REV
567	ID0405	AT&TJUL2001	TRU	606	B5			ALTER	REMOVED	REV
568	ID0405	BOFAMRTGMAY2003	EFX	686	B5	B2		ALTER	NONE	MRTG
569	ID0405	BOFAMRTGMAY2003	EXP	669	B5	B2		ALTER	NONE	MRTG
570	ID0405	BOFAMRTGMAY2003	TRU	606	B5	B2		ALTER	REMOVED	MRTG
571	ID0405	FRMNAME	TRU	606	A1			REMOVE	REMOVED	FRMNAME
572	ID0405	PREADD	EXP	669	A1			REMOVE	NONE	PREADD
573	ID0407	INDEPENDENTBANKX0003	EFX	646	B7	B4		ALTER	NONE	INST
574	ID0407	INDEPENDENTBANKX0003	EXP	719	B7			ALTER	REMOVED	INST
575	ID0407	INDEPENDENTBANKX0003	TRU	701	B7			ALTER	NONE	INST
576	ID0407	WELDON\$1470	EXP	719	D1			REMOVE	REMOVED	COLL
577	ID0407	WELDON\$2200	EFX	646	D1			REMOVE	REMOVED	COLL
578	ID0407	WELDON\$4795	EXP	719	D1			REMOVE	REMOVED	COLL
579	ID0408	ADVCOLLECTION	TRU	639	D1			REMOVE	REMOVED	COLLMED
580	ID0408	FRMRNAME	TRU	639	A1			REMOVE	REMOVED	FRMNAME
581	ID0408	NEWPORTNEWSAPR2005	EXP	630	F1			REMOVE	REMOVED	REV
582	ID0408	NEWPORTNEWSAPR2005	TRU	639	F1			REMOVE	REMOVED	REV
583	ID0412	BARCLAYS	EFX	694	B4			ALTER	NONE	REV
584	ID0412	BARCLAYS	EXP	727	B4			ALTER	NONE	REV
585	ID0412	BARCLAYS	TRU	698	B4			ALTER	NONE	REV
586	ID0412	BMW	EFX	694	B4			ALTER	NONE	A
587	ID0412	BMW	EXP	727	B4			ALTER	NONE	A
588	ID0412	CHASE	EFX	694	B4			ALTER	REMOVED	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
589	ID0412	CHASE	EXP	727	B4			ALTER	REMOVED	REV
590	ID0412	CITI	EXP	727	B1			REMOVE	REMOVED	REV
591	ID0412	ETHICON	TRU	698	B8			REMOVE	REMOVED	REV
592	ID0412	GEMBDILLARDS	EXP	727	B5			REMOVE	NONE	REV
593	ID0412	HSBC	EFX	694	B4			ALTER	REMOVED	REV
594	ID0412	HSBC	TRU	698	B4			ALTER	REMOVED	REV
595	ID0412	INQBOFA	EXP	727	C1			REMOVE	REMOVED	INQ
596	ID0425	AFNIJUL2009	EFX	486	B1			REMOVE	REMOVED	TLCOLL
597	ID0425	ARROWSERSEP2008	EFX	486	B1			REMOVE	REMOVED	TLCOLL
598	ID0425	CNACFEB2008	EFX	486	B2	B6		ALTER	NONE	A
599	ID0425	CNACFEB2008	EXP	515	B2	B6		ALTER	NONE	A
600	ID0425	CNACFEB2008	TRU	454	B2	B6		ALTER	REMOVED	A
601	ID0425	COLLAPR2008	EFX	486	D1			REMOVE	NONE	COLL
602	ID0425	COLLCINCINATTIBELL	EFX	486	D3			ALTER	NONE	COLL
603	ID0425	COLLCINCINATTIBELL	TRU	454	D3			ALTER	REMOVED	COLL
604	ID0425	COLLCONTJUL2008	TRU	454	D1			REMOVE	NONE	COLL
605	ID0425	COLLDESEC2010	EFX	486	D3			ALTER	NONE	COLL
606	ID0425	COLLMPDAPR2008	EXP	515	D1			REMOVE	REMOVED	COLLMED
607	ID0425	COLLPBSEP2008	EXP	515	D1			REMOVE	REMOVED	COLL
608	ID0425	COLLPBSEP2008	TRU	454	D1			REMOVE	REMOVED	COLL
609	ID0425	COLLPLCJUN2006	EXP	515	D3			ALTER	REMOVED	COLL
610	ID0425	COLLPLCJUN2006	TRU	454	D3			ALTER	REMOVED	COLL
611	ID0425	COLLSPRJAN2010	EXP	515	D1			REMOVE	NONE	COLL
612	ID0425	COLLTMJUL2009	EXP	515	D1			REMOVE	REMOVED	COLL
613	ID0425	COLLTMJUL2009	TRU	454	D1			REMOVE	REMOVED	COLL
614	ID0425	COLLTWCMAY2009	EFX	486	D1			REMOVE	NONE	COLL
615	ID0425	COLLTWCMAY2009	EXP	515	D1			REMOVE	NONE	COLL
616	ID0425	COLLTWCMAY2009	TRU	454	D1			REMOVE	NONE	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
617	ID0425	HSBCJAN2010	EFX	486	B2			ALTER	NONE	REV
618	ID0425	HSBCJAN2010	EXP	515	B2			ALTER	NONE	REV
619	ID0425	HSBCJAN2010	TRU	454	B2			ALTER	NONE	REV
620	ID0425	LAMHANASSOC	EXP	515	B1			REMOVE	NONE	TLCOLL
621	ID0425	MAINSTCORPJUL2008	EFX	486	B1			REMOVE	NONE	TLCOLL
622	ID0425	MAINSTCORPJUL2008	EXP	515	B1			REMOVE	NONE	TLCOLL
623	ID0425	RAMAY2002	EFX	486	B2	B6		ALTER	NONE	A
624	ID0425	RAMAY2002	EXP	515	B2	B6		ALTER	NONE	A
625	ID0425	RAMAY2002	TRU	454	B2	B6		ALTER	AY	A
626	ID0427	FLEETCC	TRU	746	B1			REMOVE	REMOVED	REV
627	ID0427	TEXASHIGHEREDX6991	TRU	746	B2			ALTER	AY	ED
628	ID0428	AIGFS	EFX	490	B2	B6		ALTER	REMOVED	REV
629	ID0428	AIGFS	EXP	542	B2	B6		ALTER	UNKNOWN	REV
630	ID0430	LVNVJAN2008	EFX	457	B1	D1		REMOVE	NONE	TLCOLL
631	ID0430	LVNVJAN2008	EXP	496	B1	D1		REMOVE	NONE	TLCOLL
632	ID0430	LVNVJAN2008	TRU	472	B1	D1		REMOVE	NONE	TLCOLL
633	ID0430	LVNVJAN2009	EFX	457	B1	D1		REMOVE	NONE	TLCOLL
634	ID0430	LVNVJAN2009	EXP	496	B1	D1		REMOVE	NONE	TLCOLL
635	ID0430	LVNVJAN2009	TRU	472	B1	D1		REMOVE	NONE	TLCOLL
636	ID0432	COLLAUG2009	EFX	633	D1			REMOVE	REMOVED	COLLMED
637	ID0432	COLLAUG2009	EXP	651	D1			REMOVE	NONE	COLLMED
638	ID0432	COLLAUG2009	TRU	659	D1			REMOVE	NONE	COLLMED
639	ID0434	AGF1518	EXP	616	B5			ALTER	REMOVED	A
640	ID0434	AGF1518	TRU	569	B5			ALTER	AY	A
641	ID0434	COLLJAN2005	TRU	569	D3			ALTER	AY	COLL
642	ID0437	CHASENOV2007	EFX	582	B5	B7		ALTER	NONE	REV
643	ID0437	CHASENOV2007	EXP	552	B5	B6	B7	ALTER	NONE	REV
644	ID0437	CHASENOV2007	TRU	587	B5			ALTER	NONE	REV



**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
645	ID0437	NATCREADJJUL2010	EFX	582	B1			REMOVE	NONE	TLCOLL
646	ID0437	NATCREADJJUL2010	EXP	552	D1			REMOVE	REMOVED	COLL
647	ID0437	NORDSTROMMAR2008	EFX	582	B7			ALTER	NONE	REV
648	ID0437	NORDSTROMMAR2008	EXP	552	B7			ALTER	NONE	REV
649	ID0437	NORDSTROMMAR2008	TRU	587	B7			ALTER	NONE	REV
650	ID0437	UNIVVILLAGE\$2350	EFX	582	D1			REMOVE	NONE	COLL
651	ID0443	AMEX	TRU	771	F1			REMOVE	NONE	REV
652	ID0443	NAME	TRU	771	A1			REMOVE	REMOVE	NAME
653	ID0443	SSN	TRU	771	A3			ALTER	NONE	SSN
654	ID0445	COLLECTION\$370	EFX	551	D3			ALTER	NONE	COLL
655	ID0445	COLLECTION\$370	EXP	566	D3			ALTER	NONE	COLL
656	ID0445	COLLECTION\$416	EFX	551	D1			REMOVE	REMOVED	COLLMED
657	ID0445	COLLECTION\$416	EXP	566	D1			REMOVE	REMOVED	COLLMED
658	ID0445	COLLECTION\$809	EFX	551	D1			REMOVE	NONE	COLLMED
659	ID0445	COLLECTION\$97	EFX	551	D1			REMOVE	NONE	COLLMED
660	ID0445	COLLECTION\$97	EXP	566	D1			REMOVE	NONE	COLLMED
661	ID0445	MIDLAND	EFX	551	A1			REMOVE	NONE	TLCOLL
662	ID0445	MIDLAND	EXP	566	B1			REMOVE	NONE	TLCOLL
663	ID0445	PORTFOLIOOCT2005	EFX	551	A1			REMOVE	REMOVED	TLCOLL
664	ID0445	PORTFOLIOOCT2005	EXP	566	D1			REMOVE	REMOVED	COLL
665	ID0450	BESTBUY	EFX	644	B4			ALTER	NONE	REV
666	ID0450	BESTBUY	EXP	651	B4			ALTER	NONE	REV
667	ID0450	BESTBUY	TRU	630	B4			ALTER	NONE	REV
668	ID0456	BIMRTG	EXP	755	B1			REMOVE	NONE	MRTG
669	ID0456	BOFA	EXP	755	B1			REMOVE	REMOVED	REV
670	ID0456	CHASE	EXP	755	B1			REMOVE	REMOVED	REV
671	ID0456	CHASEBB	EXP	755	B1			REMOVE	REMOVED	REV
672	ID0456	CITI	EXP	755	B1			REMOVE	REMOVED	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
673	ID0456	CMMRTG	EXP	755	B1			REMOVE	REMOVED	MRTG
674	ID0456	CURADD	EXP	755	A1			ALTER	AY	CURADD
675	ID0456	DISC2003	EXP	755	B1			REMOVE	REMOVED	REV
676	ID0456	DISC2010	EXP	755	B1			REMOVE	REMOVED	REV
677	ID0456	EMPL	EXP	755	A2			ALTER	REMOVED	EMPL
678	ID0456	FBMRTG	EXP	755	B1			REMOVE	REMOVED	MRTG
679	ID0456	FRMNAME	EXP	755	A1			REMOVE	REMOVED	FRMNAME
680	ID0456	FUSA	EXP	755	B1			REMOVE	REMOVED	REV
681	ID0456	GEMB	EXP	755	B1			REMOVE	REMOVED	REV
682	ID0456	HPB&T	EXP	755	B1			REMOVE	REMOVED	A
683	ID0456	HSBCBB	EXP	755	B1			REMOVE	REMOVED	REV
684	ID0456	HSBCE	EXP	755	B1			REMOVE	REMOVED	REV
685	ID0456	JCP	EXP	755	B1			REMOVE	REMOVED	REV
686	ID0456	RK	EXP	755	B1			REMOVE	REMOVED	REV
687	ID0456	SEARS	EXP	755	B1			REMOVE	REMOVED	REV
688	ID0456	SSN	EXP	755	A3			ALTER	AY	SSN
689	ID0456	TARGET	EXP	755	B1			REMOVE	REMOVED	REV
690	ID0456	THD	EXP	755	B1			REMOVE	REMOVED	REV
691	ID0469	GRLHEL	EFX	678	B4			ALTER	NONE	HEL
692	ID0472	THDJAN1997	EFX	739	B7			ALTER	AY	REV
693	ID0472	THDJAN1997	EXP	738	B7	B2		ALTER	AY	REV
694	ID0479	COLLATT2010	EXP	586	D1			REMOVE	NONE	COLL
695	ID0479	COLLATT2011	EXP	586	D1			REMOVE	NONE	COLL
696	ID0479	COLLSEP2009\$305	EFX	541	D1			REMOVE	NONE	COLLMED
697	ID0479	COLLSPRINT	EFX	541	D1			REMOVE	REMOVED	COLL
698	ID0479	COLLSPRINT	EXP	586	D1			REMOVE	REMOVED	COLL
699	ID0479	COLLSPRINT	TRU	584	D1			REMOVE	REMOVED	COLL
700	ID0479	LIFEB2006	EFX	541	E1			REMOVE	NONE	PR

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
701	ID0479	OCW	EFX	541	B4			ALTER	NONE	MRTG
702	ID0479	OCW	EXP	586	B4			ALTER	NONE	MRTG
703	ID0481	BLOOMINGDALES	EFX	708	B4			ALTER	AY	REV
704	ID0481	BLOOMINGDALES	EXP	756	B4			ALTER	AY	REV
705	ID0481	BLOOMINGDALES	TRU	708	B4			ALTER	AY	REV
706	ID0481	CURADD	EFX	708	A1			ALTER	AY	PREADD
707	ID0481	PREVADD	EXP	756	A1			REMOVE	NONE	PREADD
708	ID0482	BACHOMELNSAPR2005	EFX	708	B1			REMOVE	NONE	HEL
709	ID0482	BACHOMELNSAPR2005	EXP	665	B1			REMOVE	NONE	REV
710	ID0482	BACHOMELNSAPR2005	TRU	643	B1			REMOVE	NONE	HEL
711	ID0482	BACHOMELNSJUN2004	EFX	708	B4			ALTER	NONE	MRTG
712	ID0482	BACHOMELNSJUN2004	EXP	665	B4			ALTER	NONE	MRTG
713	ID0482	BACHOMELNSJUN2004	TRU	643	B4			ALTER	NONE	MRTG
714	ID0487	NCTX0001	EFX	736	B4			ALTER	NONE	ED
715	ID0487	NCTX0001	EXP	724	B4			ALTER	NONE	ED
716	ID0487	NCTX0001	TRU	714	B4			ALTER	NONE	ED
717	ID0493	ASHLEROAKS\$219	EFX	608	D3			ALTER	NONE	COLL
718	ID0493	ASHLEROAKS\$219	EXP	623	D3			ALTER	NONE	COLL
719	ID0493	ASHLEROAKS\$219	TRU	632	D3			ALTER	NONE	COLL
720	ID0493	ATT\$162	EFX	608	D3			ALTER	REMOVED	COLL
721	ID0493	ATT\$162	TRU	632	D3			ALTER	REMOVED	COLL
722	ID0493	PREVADD	EFX	608	A1			REMOVE	REMOVED	PREADD
723	ID0493	PREVADD	EXP	623	A1			REMOVE	NONE	PREADD
724	ID0498	INQCONSUMERCE	EFX	777	C1			REMOVE	NONE	INQ
725	ID0499	BLUECROSS	EFX	807	F1			REMOVE	NONE	INST
726	ID0502	BOFAOCT1996	EXP	795	B2			ALTER	REMOVED	REV
727	ID0502	HUNTINGTONAPR2004	EFX	761	B5			ALTER	REMOVED	MRTG
728	ID0502	VISAOCT1996	EXP	795	B1			REMOVE	REMOVED	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
729	ID0503	CITIJUN2006	EFX	777	B7			ALTER	NONE	REV
730	ID0503	CITIJUN2006	EXP	781	B7			ALTER	AY	REV
731	ID0503	CITIJUN2006	TRU	759	B7			ALTER	AY	REV
732	ID0515	MERVYNSFEB1988	EXP	824	B7			ALTER	AY	REV
733	ID0515	SHELLJULY2000	EFX	817	B1			REMOVE	REMOVED	REV
734	ID0515	SHELLJULY2000	EXP	824	B1			REMOVE	REMOVED	REV
735	ID0515	SHELLJULY2000	TRU	791	B1			REMOVE	REMOVED	REV
736	ID0516	CAPONEAUG2004\$29	EFX	586	F1			REMOVE	REMOVED	REV
737	ID0516	CAPONEAUG2004\$29	EXP	630	F1			REMOVE	REMOVED	REV
738	ID0516	CAPONEAUG2004\$29	TRU	600	F1			REMOVE	REMOVED	REV
739	ID0516	CAPONEAUG2004\$334	EFX	586	F1			REMOVE	NONE	REV
740	ID0516	CAPONEAUG2004\$334	EXP	630	F1			REMOVE	NONE	REV
741	ID0516	CAPONEAUG2004\$334	TRU	600	F1			REMOVE	NONE	REV
742	ID0516	CAPONECOLLECT\$107	EFX	586	D1			REMOVE	REMOVED	COLL
743	ID0516	CAPONECOLLECT\$107	EXP	630	D1			REMOVE	NONE	COLL
744	ID0516	CAPONECOLLECT\$107	TRU	600	D1			REMOVE	REMOVED	COLL
745	ID0516	CAPONEJULY2006	EFX	586	F1			REMOVE	REMOVED	REV
746	ID0516	CAPONEJULY2006	EXP	630	F1			REMOVE	NONE	REV
747	ID0516	CAPONEJULY2006	TRU	600	F1			REMOVE	NONE	REV
748	ID0516	CAPONEMAR2003	EFX	586	F1			REMOVE	NONE	REV
749	ID0516	CAPONEMAR2003	EXP	630	F1			REMOVE	NONE	REV
750	ID0516	CAPONEMAR2003	TRU	600	F1			REMOVE	NONE	REV
751	ID0516	CREDITFEB2007	EFX	586	B1			REMOVE	REMOVED	TLCOLL
752	ID0516	CREDITFEB2007	EXP	630	B1			REMOVE	NONE	A
753	ID0516	CREDITFEB2007	TRU	600	B1			REMOVE	NONE	A
754	ID0516	CREDITONENOV2004	EFX	586	B1			REMOVE	REMOVED	REV
755	ID0516	CREDITONENOV2004	EXP	630	B1			REMOVE	REMOVED	REV
756	ID0516	DSRMMAR2006	EFX	586	B1			REMOVE	NONE	TLCOLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
757	ID0516	DSRMMAR2006	TRU	600	B1			REMOVE	NONE	TLCOLL
758	ID0516	MIDLANDAUG2007	EFX	586	B1			REMOVE	NONE	TLCOLL
759	ID0516	MIDLANDAUG2007	EXP	630	B1			REMOVE	NONE	U
760	ID0516	MIDLANDAUG2007	TRU	600	D1			REMOVE	NONE	COLL
761	ID0518	CAPONEJUNE2008	EFX	651	B2	B5	B6	ALTER	UNKNOWN	A
762	ID0518	CAPONEJUNE2008	EXP	635	B2	B5	B6	ALTER	AY	A
763	ID0518	CAPONEJUNE2008	TRU	639	B2	B5	B6	ALTER	UNKNOWN	A
764	ID0518	CURRADD	EFX	651	A1			REMOVE	UNKNOWN	CURRADD
765	ID0518	MEDCOLL\$46	EXP	635	D1			REMOVE	NONE	COLLMED
766	ID0518	WFFMARCH2005	EFX	651	B1			REMOVE	UNKNOWN	REV
767	ID0518	WFFMARCH2005	EXP	635	B1			REMOVE	NONE	REV
768	ID0518	WFFMARCH2005	TRU	639	B1			REMOVE	UNKNOWN	REV
769	ID0520	TAXLIENOCT2002	EFX	732	E1			REMOVE	REMOVED	PR
770	ID0522	AA\$273	EFX	690	B1			REMOVE	AP	TLCOLL
771	ID0522	AA\$273	EXP	689	B1			REMOVE	AP	TLCOLL
772	ID0522	AA\$273	TRU	691	D1			REMOVE	NONE	COLL
773	ID0522	COLLECTIONAPR2005X2001	EFX	690	D1			REMOVE	REMOVED	COLLMED
774	ID0522	COLLECTIONAPR2005X2001	EXP	689	D1			REMOVE	REMOVED	COLLMED
775	ID0522	COLLECTIONAPR2005X2001	TRU	691	D1			REMOVE	REMOVED	COLLMED
776	ID0522	DISHNETWORKX6290	TRU	691	D1			REMOVE	REMOVED	COLL
777	ID0522	EMBARQX1194	EXP	689	D1			REMOVE	REMOVED	COLL
778	ID0522	EMBARQX1194	TRU	691	D1			REMOVE	REMOVED	COLL
779	ID0522	TAXLIEN\$13654	EXP	689	E1			REMOVE	NONE	PR
780	ID0522	TAXLIEN\$13654	TRU	691	E1			REMOVE	REMOVED	PR
781	ID0522	TAXLIENX0574	TRU	691	E1			REMOVE	REMOVED	PR
782	ID0522	TAXLIENX3091	EFX	690	E1			REMOVE	REMOVED	PR
783	ID0522	TAXLIENX4519	TRU	691	E1			REMOVE	REMOVED	PR
784	ID0522	TAXLIENX9212	TRU	691	E1			REMOVE	REMOVED	PR

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
785	ID0523	AURORAX1378	EFX	637	B1			REMOVE	NONE	MRTG
786	ID0523	AURORAX1378	EXP	557	B1			REMOVE	NONE	MRTG
787	ID0523	AURORAX1378	TRU	653	B1			REMOVE	NONE	MRTG
788	ID0523	BACHOMELOANSX9505	EFX	637	B1			REMOVE	NONE	MRTG
789	ID0523	BACHOMELOANSX9505	EXP	557	B1			REMOVE	NONE	MRTG
790	ID0523	BACHOMELOANSX9505	TRU	653	B1			REMOVE	NONE	MRTG
791	ID0523	WELLSFARGOJUNE2001	EFX	637	B1			REMOVE	NONE	REV
792	ID0523	WELLSFARGOJUNE2001	EXP	557	B1			REMOVE	NONE	REV
793	ID0523	WELLSFARGOJUNE2001	TRU	653	B1			REMOVE	NONE	REV
794	ID0526	COLLECTIONJAN2009	EFX	668	D1			REMOVE	NONE	COLLMED
795	ID0526	COLLECTIONJAN2009	EXP	673	D1			REMOVE	NONE	COLLMED
796	ID0526	COLLECTIONJAN2009	TRU	693	D1			REMOVE	REMOVED	COLLMED
797	ID0526	FRMRNAME1	TRU	693	A1			REMOVE	REMOVED	FRMNAME
798	ID0526	FRMRNAME2	TRU	693	A1			REMOVE	REMOVED	FRMNAME
799	ID0526	FRMRNAME3	EFX	668	A1			REMOVE	REMOVED	FRMNAME
800	ID0526	FRMRNAME4	EXP	673	A1			REMOVE	NONE	FRMNAME
801	ID0526	PREVADD	EXP	673	A1			ALTER	AY	PREVADD
802	ID0526	PREVADD	TRU	693	A1			ALTER	AY	PREVADD
803	ID0532	COMCASTAPR2011	EFX	548	D1			REMOVE	REMOVED	COLL
804	ID0532	COMCASTAPR2011	TRU	559	D1			REMOVE	REMOVED	COLL
805	ID0532	MEDCOLL254	EFX	548	D1			REMOVE	NONE	COLLMED
806	ID0532	MEDCOLL254	EXP	586	D1			REMOVE	NONE	COLLMED
807	ID0532	MEDCOLL254	TRU	559	D1			REMOVE	NONE	COLLMED
808	ID0532	MEDCOLL597	EFX	548	D1			REMOVE	NONE	COLLMED
809	ID0532	MEDCOLL597	EXP	586	D1			REMOVE	NONE	COLLMED
810	ID0532	MEDCOLL597	TRU	559	D1			REMOVE	NONE	COLLMED
811	ID0532	RELIANTENERGY	EFX	548	D1			REMOVE	REMOVED	COLL
812	ID0532	RELIANTENERGY	EXP	586	D1			REMOVE	REMOVED	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
813	ID0532	RELIANTENERGY	TRU	559	D1			REMOVE	REMOVED	COLL
814	ID0536	ALLIEDX0601	TRU	584	D1			REMOVE	REMOVED	COLLMED
815	ID0536	ALLIEDX0602	TRU	584	D1			REMOVE	REMOVED	COLLMED
816	ID0536	ALLIEDX9202	TRU	584	D1			REMOVE	REMOVED	COLLMED
817	ID0536	COXX297	EXP	585	D3			ALTER	REMOVED	COLL
818	ID0536	CURRADDRESS	EFX	562	A1			ALTER	NONE	CURRADD
819	ID0536	PRESTIGE OCT2001	EFX	562	B2	B6	B4	ALTER	NONE	A
820	ID0536	PRESTIGE OCT2001	EXP	585	B2	B6	B4	ALTER	REMOVED	A
821	ID0536	SPRINT577	EFX	562	D3			ALTER	REMOVED	COLL
822	ID0536	SPRINT577	EXP	585	D3			ALTER	REMOVED	COLL
823	ID0536	SPRINT577	TRU	584	D3			ALTER	REMOVED	COLL
824	ID0536	SPRINT578	EFX	562	D3			ALTER	REMOVED	COLL
825	ID0536	SPRINT578	EXP	585	D3			ALTER	REMOVED	COLL
826	ID0536	SPRINT578	TRU	584	D3			ALTER	REMOVED	COLL
827	ID0537	ADDRESSES	TRU	724	A1			ALTER	AY	CURRADD
828	ID0537	EQUABLE OCT2009	EFX	713	B1			REMOVE	REMOVED	TLCOLL
829	ID0537	LEGALITEM JUN2009	EFX	713	E1			REMOVE	NONE	PR
830	ID0537	TRUENORTH OCT2008	EXP	720	D1			REMOVE	REMOVED	COLL
831	ID0537	TRUENORTH OCT2008	TRU	724	D1			REMOVE	REMOVED	COLL
832	ID0542	ARBORS DEC2008	EFX	661	D1			REMOVE	REMOVED	COLL
833	ID0543	TDAUTODEC2005	EXP	744	B2			ALTER	AY	A
834	ID0543	TDAUTODEC2005	TRU	708	B2			ALTER	AY	A
835	ID0548	KARSAZ JULY2006	EXP	688	D1			REMOVE	AP	COLL
836	ID0548	KARSAZ SEPT2008	EXP	688	D1			REMOVE	REMOVED	COLL
837	ID0553	MACYS SEPT1975	EFX	780	B4			ALTER	AY	REV
838	ID0553	MACYS SEPT1975	TRU	779	B4			ALTER	AY	REV
839	ID0555	AKUSANOV2000	EFX	672	B7			ALTER	AY	REV
840	ID0555	AKUSANOV2000	EXP	673	B7			ALTER	AY	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
841	ID0555	AKUSANOV2000	TRU	671	B7			ALTER	AY	REV
842	ID0555	GMACFEB2003	EXP	673	B4			ALTER	REMOVED	A
843	ID0555	HSBCSEPT1999	EFX	672	B4			ALTER	REMOVED	REV
844	ID0555	HSBCSEPT1999	EXP	673	B4			ALTER	REMOVED	REV
845	ID0555	HSBCSEPT1999	TRU	671	B4			ALTER	REMOVED	REV
846	ID0555	LVNVACCT	EFX	672	B5	B7		ALTER	REMOVED	TLCOLL
847	ID0555	LVNVACCT	EXP	673	B5	B7		ALTER	REMOVED	TLCOLL
848	ID0555	LVNVACCT	TRU	671	B5	B7		ALTER	REMOVED	TLCOLL
849	ID0557	BOFAMAY2008	TRU	581	D3			ALTER	NONE	COLL
850	ID0557	EXPRESSMAY2007	EFX	583	B2	B5	B7	ALTER	NONE	REV
851	ID0557	EXPRESSMAY2007	EXP	638	B2	B5	B7	ALTER	NONE	REV
852	ID0557	EXPRESSMAY2007	TRU	581	B2	B5	B7	ALTER	NONE	REV
853	ID0564	DISCOVERFEB2010	TRU	733	F1			REMOVE	REMOVED	REV
854	ID0564	MEDAUG2010	EFX	741	B1			REMOVE	NONE	REV
855	ID0564	MEDAUG2010	EXP	744	B1			REMOVE	NONE	REV
856	ID0570	CHASEDEC1998	EXP	567	B4			ALTER	NONE	REV
857	ID0570	CHSEAUG2005	EXP	567	B4			ALTER	NONE	REV
858	ID0570	NAME	EXP	567	A1			REMOVE	NONE	NAME
859	ID0570	ZALES AUG2010 INQ	EXP	567	C1			REMOVE	NONE	INQ
860	ID0571	NAME	TRU	687	A1			REMOVE	NONE	NAME
861	ID0571	UNIVERSALJULY2005	EFX	704	B1			REMOVE	REMOVED	REV
862	ID0571	UNIVERSALJULY2005	EXP	681	B1			REMOVE	NONE	REV
863	ID0571	UNIVERSALJULY2005	TRU	687	B1			REMOVE	NONE	REV
864	ID0573	LEWISTONMAY2005	EFX	656	D3			ALTER	NONE	COLL
865	ID0573	LEWISTONMAY2005	TRU	659	D3			ALTER	REMOVED	COLL
866	ID0584	COLLECTAUG2009	EFX	615	B5	B2	B6	ALTER	REMOVED	TLCOLL
867	ID0584	COLLECTAUG2009	TRU	585	D1			REMOVE	REMOVED	COLLMED
868	ID0584	WFHMAUG2006	EFX	615	B4			ALTER	NONE	MRTG



**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
869	ID0584	WFHMAUG2006	EXP	678	B4			ALTER	NONE	MRTG
870	ID0585	AMEXMAY1996	TRU	607	B8			ALTER	REMOVED	REV
871	ID0585	EMPL	EXP	660	A2			REMOVE	NONE	EMPL
872	ID0585	PREADD	EXP	660	A1			REMOVE	NONE	PREADD
873	ID0587	ATTX3223	EFX	662	D1			REMOVE	REMOVED	COLL
874	ID0590	CHASE1994	EXP	779	B7			ALTER	REMOVED	REV
875	ID0590	EXXMBLCITI	EXP	779	B7			ALTER	AY	REV
876	ID0590	INQORCS	EFX	753	C1			REMOVE	REMOVED	INQ
877	ID0592	COLL\$135	EFX	652	D1			REMOVE	NONE	COLLMED
878	ID0592	COLL\$135	TRU	650	D1			REMOVE	NONE	COLLMED
879	ID0592	COLL\$507	EXP	655	D1			REMOVE	REMOVED	COLL
880	ID0592	COLL\$507	TRU	650	D1			REMOVE	REMOVED	COLL
881	ID0592	COLL\$62	EFX	652	D1			REMOVE	NONE	COLLMED
882	ID0592	COLL\$62	TRU	650	D1			REMOVE	REMOVED	COLLMED
883	ID0597	CHASEDEC2007	EFX	780	B1			REMOVE	REMOVED	REV
884	ID0597	CHASEDEC2007	EXP	757	B1			REMOVE	REMOVED	REV
885	ID0597	CHASEDEC2007	TRU	779	B1			REMOVE	REMOVED	REV
886	ID0599	LIEN\$1506	EXP	609	E1			REMOVE	NONE	PR
887	ID0599	LIEN\$9487	TRU	641	E1			REMOVE	REMOVED	PR
888	ID0599	LIEN\$9497	TRU	641	E1			REMOVE	REMOVED	PR
889	ID0599	LIEN\$9500	TRU	641	E1			REMOVE	REMOVED	PR
890	ID0599	LIEN\$967	EXP	609	E1			REMOVE	NONE	PR
891	ID0599	MRS1300	EXP	609	B1			REMOVE	NONE	INST
892	ID0605	BARCLAYSEPT2007	EFX	682	B1			REMOVE	NONE	REV
893	ID0605	BARCLAYSEPT2007	EXP	686	B1			REMOVE	NONE	REV
894	ID0605	BARCLAYSEPT2007	TRU	695	B1			REMOVE	NONE	REV
895	ID0605	BOFASEPT2007	EFX	682	B1			REMOVE	NONE	REV
896	ID0605	BOFASEPT2007	EXP	686	B1			REMOVE	NONE	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
897	ID0605	BOFASEPT2007	TRU	695	B1			REMOVE	NONE	REV
898	ID0605	CHASEAUG2008	EFX	682	B1			REMOVE	NONE	REV
899	ID0605	CHASEAUG2008	EXP	686	B1			REMOVE	NONE	REV
900	ID0605	CHASEAUG2008	TRU	695	B1			REMOVE	NONE	REV
901	ID0605	CHASESEPT2006	EFX	682	B1			REMOVE	NONE	REV
902	ID0605	CHASESEPT2006	EXP	686	B1			REMOVE	NONE	REV
903	ID0605	CHASESEPT2006	TRU	695	B1			REMOVE	NONE	REV
904	ID0606	CHASEOCT2008	EXP	693	B4			ALTER	NONE	REV
905	ID0606	PRBANKRUPTCY	EXP	693	E2			ALTER	REMOVED	PR
906	ID0606	PRBANKRUPTCY	TRU	636	F2	F3		REMOVE	REMOVED	PR
907	ID0606	PRBANKRUPTCY	TRU	636	E2			ALTER	REMOVED	PR
908	ID0606	PREADD	EXP	693	A1			REMOVE	REMOVED	PREADD
909	ID0606	PREADD	TRU	636	A1			REMOVE	REMOVED	PREADD
910	ID0614	COLLMAR2009	EFX	533	D1			REMOVE	NONE	COLLMED
911	ID0614	COLLMAR2009	TRU	552	D1			REMOVE	NONE	COLLMED
912	ID0614	COLLSEP2005	EFX	533	D1			REMOVE	REMOVED	COLLMED
913	ID0614	COLLSEP2005	TRU	552	D1			REMOVE	REMOVED	COLLMED
914	ID0614	CRDTONEDEC2007	EFX	533	B1			REMOVE	NONE	REV
915	ID0614	CRDTONEDEC2007	TRU	552	B1			REMOVE	NONE	REV
916	ID0614	LVNC\$582MAR2009	TRU	552	B1	D1		REMOVE	NONE	TLCOLL
917	ID0614	LVNV\$438MAR2009	TRU	552	B1	D1		REMOVE	NONE	TLCOLL
918	ID0614	LVNVF\$438MAR2009	EFX	533	B1	D1		REMOVE	NONE	TLCOLL
919	ID0614	LVNVF\$582MAR2009	EFX	533	B1	D1		REMOVE	NONE	TLCOLL
920	ID0614	VERIZONAUG1974	EFX	533	B1			REMOVE	REMOVED	REV
921	ID0614	VERIZONAUG1974	TRU	552	B1			REMOVE	REMOVED	REV
922	ID0616	CITIOCT1996	EFX	659	B4			ALTER	AP	REV
923	ID0616	CITIOCT1996	EXP	672	B4			ALTER	AP	REV
924	ID0616	INQJAN32011	EXP	672	C1			REMOVE	NONE	INQ

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
925	ID0623	BRAZOSSEPT2004	TRU	559	B2			ALTER	AY	ED
926	ID0623	CAPONEJAN2000	TRU	559	B2			ALTER	REMOVED	REV
927	ID0626	WFBJUNE1983	EFX	788	B1			REMOVE	REMOVED	REV
928	ID0627	CURRADD	EXP	584	A1			ALTER	NONE	CURRADD
929	ID0627	SMAPR1992	EFX	641	B2			ALTER	NONE	ED
930	ID0627	SMAPR1992	EXP	584	B2			ALTER	NONE	ED
931	ID0627	SMAPR1992	TRU	596	B2			ALTER	NONE	ED
932	ID0627	SMAPR1994	EFX	641	B2			ALTER	AY	ED
933	ID0627	SMAPR1994	EXP	584	B2			ALTER	AY	ED
934	ID0627	SMAPR1994	TRU	596	B2			ALTER	AY	ED
935	ID0627	SMMAY1993	EFX	641	B2			ALTER	AY	ED
936	ID0627	SMMAY1993	EXP	584	B2			ALTER	AY	ED
937	ID0627	SMMAY1993	TRU	596	B2			ALTER	AY	ED
938	ID0627	SMOCT1991	EFX	641	B2			ALTER	NONE	ED
939	ID0627	SMOCT1991	EXP	584	B2			ALTER	NONE	ED
940	ID0627	SMOCT1991	TRU	596	B2			ALTER	NONE	ED
941	ID0627	SMSEP1992	EFX	641	B2			ALTER	NONE	ED
942	ID0627	SMSEP1992	EXP	584	B2			ALTER	NONE	ED
943	ID0627	SMSEP1992	TRU	596	B2			ALTER	NONE	ED
944	ID0627	SMSEP1993	EFX	641	B2			ALTER	AY	ED
945	ID0627	SMSEP1993	EXP	584	B2			ALTER	AY	ED
946	ID0627	SMSEP1993	TRU	596	B2			ALTER	AY	ED
947	ID0628	BOFASEPT1995	TRU	791	B3			ALTER	NONE	REV
948	ID0628	PREVADD	EXP	803	A1			REMOVE	REMOVED	PREADD
949	ID0628	UNLV/CITIDEC1994	EXP	803	B1			REMOVE	REMOVED	REV
950	ID0633	FORMERNAME	EXP	821	A1			REMOVE	REMOVED	NAME
951	ID0633	MULLENSEP2002	EFX	801	B7			ALTER	AY	INST
952	ID0633	MULLENSEP2002	EXP	821	B7			ALTER	NONE	A

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
953	ID0633	MULLENSEP2002	TRU	810	B7			ALTER	REMOVED	A
954	ID0646	BOFAREVJUN1996	EFX	721	B1			REMOVE	REMOVED	REV
955	ID0646	BOFAREVJUN1996	TRU	704	B1			REMOVE	REMOVED	REV
956	ID0646	CITIREVOCT1998	EFX	721	B1			REMOVE	REMOVED	REV
957	ID0646	CITIREVOCT1998	TRU	704	B1			REMOVE	REMOVED	REV
958	ID0647	MRTGX6300	EFX	552	B7	B2	B5	ALTER	AP	MRTG
959	ID0647	MRTGX6300	EXP	541	B7	B2	B5	ALTER	UNKNOWN	MRTG
960	ID0647	MRTGX6300	TRU	537	B7	B2	B5	ALTER	REMOVED	MRTG
961	ID0647	PREVADD	EFX	552	A1			REMOVE	REMOVED	PREADD
962	ID0647	PREVADD	EXP	541	A1			REMOVE	UNKNOWN	PREADD
963	ID0647	PREVADD	TRU	537	A1			REMOVE	REMOVED	PREADD
964	ID0647	TOYOTAMAY2006	EFX	552	B5	B7		ALTER	AP	A
965	ID0647	TOYOTAMAY2006	EXP	541	B5	B7		ALTER	UNKNOWN	A
966	ID0647	TOYOTAMAY2006	TRU	537	B7			ALTER	REMOVED	A
967	ID0648	CHASE\$1	EFX	796	B2			ALTER	AY	REV
968	ID0648	CHASE\$1	EXP	789	B2			ALTER	AY	REV
969	ID0648	CHASE\$1	TRU	774	B2			ALTER	AY	REV
970	ID0649	ARROWOCT2008	EXP	679	D3	D2		ALTER	REMOVED	COLL
971	ID0649	ARROWOCT2008	TRU	496	D3	D2		ALTER	REMOVED	COLL
972	ID0649	BAKERBBKJUNE2006	EFX	522	B7			ALTER	UNKNOWN	INST
973	ID0649	BAKERBBKJUNE2006	TRU	496	B5	B7		ALTER	NONE	INST
974	ID0649	COLLECT\$481	EFX	522	D3			ALTER	UNKNOWN	COLLMED
975	ID0649	COLLECT\$481	TRU	496	D3			ALTER	AY	COLLMED
976	ID0649	FORMERNAME	EFX	522	A1			REMOVE	UNKNOWN	FRMNAME
977	ID0649	HSBCJULY2007	EFX	522	B5	B7		ALTER	UNKNOWN	REV
978	ID0649	HSBCJULY2007	TRU	496	B5			ALTER	AY	REV
979	ID0649	LEGALITEMMAY2004	EFX	522	E2			ALTER	UNKNOWN	PR
980	ID0649	MIRAMEDRGJAN2009	TRU	496	D3			ALTER	REMOVED	COLLMED

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
981	ID0649	PINJAN2009	EFX	522	B1			REMOVE	UNKNOWN	TLCOLL
982	ID0649	PINJAN2009	EXP	679	D1			REMOVE	NONE	COLL
983	ID0649	PINJAN2009	TRU	496	D1			REMOVE	NONE	COLL
984	ID0649	PREVADDA	TRU	496	A1			REMOVE	REMOVED	PREADD
985	ID0649	PREVADDB	EXP	679	A1			REMOVE	REMOVED	PREADD
986	ID0649	TAXLIENJULY1994	EFX	522	E1			REMOVE	UNKNOWN	PR
987	ID0649	TOYOTASEP2002	TRU	496	B5			ALTER	REMOVED	A
988	ID0649	VALLEYSEP2002	EFX	522	B2	B6		ALTER	UNKNOWN	U
989	ID0649	VALLEYSEP2002	EXP	679	B2	B6		ALTER	REMOVED	INST
990	ID0649	VERIZON	TRU	496	B1			REMOVE	REMOVED	UTIL
991	ID0651	BONMARCHEMAR2006	EXP	686	B2	B21	B	ALTER	AP	A
992	ID0651	BONMARCHEMAR2006	TRU	692	B21	B22		ALTER	NONE	A
993	ID0651	CRDTFIRSTMAY2004	EFX	695	B1			REMOVE	NONE	REV
994	ID0651	CURRADD	EFX	695	A1			ALTER	AY	CURRADD
995	ID0651	CURRADD	EXP	686	A1			ALTER	AY	CURRADD
996	ID0657	COLLADVASSETSJUL2010	EXP	482	D1			REMOVE	REMOVED	COLL
997	ID0657	COLLADVASSETSJUL2010	TRU	529	D1			REMOVE	REMOVED	COLL
998	ID0657	EMPL	EFX	584	A2			ALTER	AY	EMPL
999	ID0657	EMPL	EXP	482	A2			REMOVE	NONE	EMPL
1000	ID0657	EMPL	TRU	529	A2			ALTER	AY	EMPL
1001	ID0657	INQAC&FJAN2010	TRU	529	C1			REMOVE	REMOVED	INQ
1002	ID0657	INQHSBCFEB2010	EXP	482	C1			REMOVE	REMOVED	INQ
1003	ID0657	INQJPFJAN2010	TRU	529	C1			REMOVE	REMOVED	INQ
1004	ID0657	INQLERJUNE2010	TRU	529	C1			REMOVE	NONE	INQ
1005	ID0657	INQNCBFE2010	TRU	529	C1			REMOVE	REMOVED	INQ
1006	ID0657	PREVADD	EFX	584	A1			REMOVE	REMOVED	PREADD
1007	ID0671	COLUMBIAX7704	EXP	598	D1			REMOVE	NONE	COLL
1008	ID0671	DEPTOFEDX0010	EFX	605	B5	B7		ALTER	REMOVED	ED

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1009	ID0671	DEPTOFEDX0010	TRU	615	B7			ALTER	NONE	ED
1010	ID0671	DISHAUG2010	EFX	605	D1			REMOVE	REMOVED	COLL
1011	ID0671	DISHAUG2010	EXP	598	D1			REMOVE	NONE	COLL
1012	ID0671	FORMERNAME"R"	EFX	605	A1			REMOVE	REMOVED	FRMNAME
1013	ID0671	FORMERNAME"R"	TRU	615	A1			REMOVE	REMOVED	FRMNAME
1014	ID0671	INQCREDCOOCT2010	EXP	598	C1			REMOVE	NONE	INQ
1015	ID0671	NUVELLX6404	EFX	605	B2			ALTER	REMOVED	INST
1016	ID0671	TAXLIENSEP2010	EFX	605	E2			ALTER	NONE	PR
1017	ID0671	TAXLIENSEP2010	EXP	598	E2			ALTER	NONE	PR
1018	ID0671	TAXLIENSEP2010	TRU	615	E2			ALTER	NONE	PR
1019	ID0671	VILLASAUG2004	TRU	615	D1			REMOVE	REMOVED	COLL
1020	ID0671	WELLSFARGOX7377	EXP	598	B4			ALTER	NONE	MRTG
1021	ID0672	CHASEMAY2003	EFX	794	B4			ALTER	NONE	HEL
1022	ID0672	CHASEMAY2003	TRU	754	B4			ALTER	NONE	HEL
1023	ID0672	SAABMAY2005	EFX	794	B5			ALTER	AY	A
1024	ID0672	SAABMAY2005	TRU	754	B5			ALTER	REMOVED	A
1025	ID0674	NATIONWIDEAUG2009	EXP	567	D3			REMOVE	REMOVED	COLL
1026	ID0674	NATIONWIDEAUG2009	TRU	546	D3			REMOVE	REMOVED	COLL
1027	ID0674	USDEPTOFEDX1282	EFX	518	B4			ALTER	NONE	ED
1028	ID0674	USDEPTOFEDX1282	TRU	546	B4			ALTER	NONE	ED
1029	ID0677	INQWFJUNE2010	EFX	733	C1			REMOVE	NONE	INQ
1030	ID0681	BLAIRCORPMAR2003	EFX	629	B5			ALTER	REMOVED	REV
1031	ID0682	AMEXJUL1990	TRU	731	B2			ALTER	AY	REV
1032	ID0682	MB1861	TRU	731	B1			REMOVE	REMOVED	A
1033	ID0682	MB1869	TRU	731	B1			REMOVE	REMOVED	A
1034	ID0682	VW0658	EFX	809	B10			REMOVE	NONE	A
1035	ID0682	VW0658	TRU	731	B10			REMOVE	NONE	A
1036	ID0684	HERITAGE	EFX	539	B2			ALTER	UNKNOWN	A,BANKACC

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1037	ID0684	REGACC	EFX	539	B2			ALTER	UNKNOWN	A
1038	ID0684	REGACC	EXP	577	B2			ALTER	UNKNOWN	A
1039	ID0684	REGACC	TRU	503	B2			ALTER	AY	A
1040	ID0684	SANTANDER1000	EFX	539	B2			ALTER	UNKNOWN	A
1041	ID0684	SANTANDER1000	EXP	577	B2			ALTER	UNKNOWN	A
1042	ID0684	SANTANDER1000	TRU	503	B2			ALTER	NONE	A
1043	ID0690	COLLECT\$1284	EFX	514	D1			REMOVE	UNKNOWN	COLLMED
1044	ID0690	COLLECT\$1284	TRU	508	D1			REMOVE	REMOVED	COLLMED
1045	ID0690	COLLECT\$262	EFX	514	D1			REMOVE	UNKNOWN	COLLMED
1046	ID0690	COLLECT\$262	EXP	488	D1			REMOVE	NONE	COLLMED
1047	ID0690	COLLECT\$262	TRU	508	D1			REMOVE	REMOVED	COLLMED
1048	ID0690	COLLECT\$495	EFX	514	D1			REMOVE	UNKNOWN	COLLMED
1049	ID0690	COLLECT\$495	EXP	488	D1			REMOVE	NONE	COLLMED
1050	ID0690	COLLECT\$495	TRU	508	D1			REMOVE	NONE	COLLMED
1051	ID0690	COLLECT\$684	EFX	514	D1			REMOVE	UNKNOWN	COLLMED
1052	ID0690	COLLECT\$684	EXP	488	D1			REMOVE	NONE	COLLMED
1053	ID0690	COLLECT\$684	TRU	508	D1			REMOVE	NONE	COLLMED
1054	ID0690	COLLECT\$85	EFX	514	D1			REMOVE	UNKNOWN	COLL
1055	ID0690	COLLECT\$85	EXP	488	D1			REMOVE	REMOVED	COLL
1056	ID0690	COLLECT\$85	TRU	508	D1			REMOVE	REMOVED	COLL
1057	ID0690	HARVARD\$103	TRU	508	D1			REMOVE	REMOVED	COLL
1058	ID0690	SNTRSTX0201	EFX	514	B5			ALTER	UNKNOWN	ED
1059	ID0690	SNTRSTX0201	TRU	508	B5			ALTER	NONE	ED
1060	ID0690	SUNTRSTX0202	EFX	514	B5			ALTER	UNKNOWN	ED
1061	ID0690	SUNTRSTX0202	TRU	508	B5			ALTER	NONE	ED
1062	ID0690	TENNSTUDN\$75,082	EFX	514	B5			ALTER	UNKNOWN	EDTLCOLL
1063	ID0690	TENNSTUDN\$75,082	EXP	488	B5			ALTER	NONE	EDTLCOLL
1064	ID0690	TENNSTUDN\$82,848	EFX	514	B5			ALTER	UNKNOWN	EDTLCOLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1065	ID0690	TENNSTUDN\$82,848	EXP	488	B5			ALTER	NONE	EDTLCOLL
1066	ID0698	DEPTOFEDX0283A	EXP	738	B2	B7		ALTER	AY	ED
1067	ID0698	DEPTOFEDX0283B	EXP	738	F1			REMOVE	NONE	ED
1068	ID0698	HIGHEDX2801	TRU	712	B2	B7		ALTER	AY	ED
1069	ID0699	PRJUNE2004	EFX	719	E1			REMOVE	AP	PR
1070	ID0702	M4873	EXP	632	B4	B7		ALTER	AP	MRTG
1071	ID0702	M4873	TRU	600	B4	B7		ALTER	AP	MRTG
1072	ID0702	M9313	EFX	642	B4	B7		ALTER	NONE	MRTG
1073	ID0702	M9313	EXP	632	B4	B7		ALTER	NONE	MRTG
1074	ID0702	M9313	TRU	600	B4	B7		ALTER	REMOVED	MRTG
1075	ID0711	ALLIANCEONEMAY2010	TRU	484	D1			REMOVE	REMOVED	COLL
1076	ID0711	AMEXLPB19	EFX	489	B1			REMOVE	UNKNOWN	REV
1077	ID0711	AMEXLPB19	TRU	484	B1			REMOVE	REMOVED	REV
1078	ID0711	AMEXMAR2000	EFX	489	B1			REMOVE	UNKNOWN	REV
1079	ID0711	AMEXMAR2000	TRU	484	B1			REMOVE	REMOVED	REV
1080	ID0711	AMEXSEP2000	EFX	489	B1			REMOVE	UNKNOWN	REV
1081	ID0711	AMEXSEP2000	TRU	484	B1			REMOVE	REMOVED	REV
1082	ID0711	APPLIEDFEB1998	TRU	484	B1			REMOVE	NONE	REV
1083	ID0711	APPLIEDSEP1998A	TRU	484	B1			REMOVE	REMOVED	REV
1084	ID0711	APPLIEDSEP1998A	TRU	484	B1			REMOVE	REMOVED	REV
1085	ID0711	APPLIEDSEP1998B	TRU	484	B1			REMOVE	REMOVED	REV
1086	ID0711	BANKFIRSTJUNE1998	TRU	484	B1			REMOVE	REMOVED	REV
1087	ID0711	CAPONEAUG1999	EFX	489	B1			REMOVE	UNKNOWN	REV
1088	ID0711	CAPONEAUG1999	TRU	484	B1			REMOVE	REMOVED	REV
1089	ID0711	CAPONEDEC2000	EFX	489	B1			REMOVE	UNKNOWN	REV
1090	ID0711	CAPONEDEC2000	TRU	484	B1			REMOVE	REMOVED	REV
1091	ID0711	CAPONEFEB2002	EFX	489	B1			REMOVE	UNKNOWN	REV
1092	ID0711	CAPONEFEB2002	TRU	484	B1			REMOVE	REMOVED	REV



**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1093	ID0711	CHASEAUG1999	EFX	489	B1			REMOVE	UNKNOWN	REV
1094	ID0711	CHASEOCT2002	EFX	489	B1			REMOVE	UNKNOWN	REV
1095	ID0711	GEMBSAMSAUG2002	EFX	489	B1			REMOVE	UNKNOWN	REV
1096	ID0711	GEMBSAMSAUG2002	TRU	484	B1			REMOVE	REMOVED	REV
1097	ID0711	GEMBWALMJUL2000	EFX	489	B1			REMOVE	UNKNOWN	REV
1098	ID0711	GEMBWALMJUL2000	TRU	484	B1			REMOVE	REMOVED	REV
1099	ID0711	LVNV\$1066	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1100	ID0711	LVNV\$1066	TRU	484	B1			REMOVE	REMOVED	TLCOLL
1101	ID0711	LVNV\$2632	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1102	ID0711	LVNV\$2632	TRU	484	B1			REMOVE	REMOVED	TLCOLL
1103	ID0711	LVNV\$471	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1104	ID0711	LVNV\$471	TRU	484	B1			REMOVE	REMOVED	TLCOLL
1105	ID0711	MIDLANDFEB2006	TRU	484	D1			REMOVE	REMOVED	COLL
1106	ID0711	MIDLANDJUNE2007	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1107	ID0711	MIDLANDJUNE2007	TRU	484	D1			REMOVE	REMOVED	COLL
1108	ID0711	MIDLANDOCT2007	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1109	ID0711	MIDLANDOCT2007	TRU	484	D1			REMOVE	REMOVED	COLL
1110	ID0711	NCOFIN\$1292	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1111	ID0711	NCOFIN\$1292	TRU	484	D1			REMOVE	REMOVED	COLL
1112	ID0711	NCOFIN\$2104	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1113	ID0711	NCOFIN\$2104	TRU	484	D1			REMOVE	REMOVED	COLL
1114	ID0711	PINNACLE\$7308	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1115	ID0711	PINNACLE\$7308	TRU	484	D1			REMOVE	REMOVED	COLL
1116	ID0711	PINNACLE\$8640	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1117	ID0711	PINNACLE\$8640	TRU	484	D1			REMOVE	REMOVED	COLL
1118	ID0711	PREVADD7217	EFX	489	A1			REMOVE	UNKNOWN	PREADD
1119	ID0711	PREVADD7217	TRU	484	A1			REMOVE	NONE	PREADD
1120	ID0711	SHELLAUG2007	EFX	489	D1			REMOVE	UNKNOWN	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1121	ID0711	SHELLAUG2007	TRU	484	D1			REMOVE	REMOVED	COLL
1122	ID0711	SHELLNOV2000	TRU	484	B1			REMOVE	REMOVED	REV
1123	ID0711	UNKNOWNFEB2006	EFX	489	B1			REMOVE	UNKNOWN	TLCOLL
1124	ID0713	MEDCOLLSEP2007	EFX	652	D			REMOVE	NONE	COLLMED
1125	ID0713	PREVNAME	TRU	592	A1			REMOVE	REMOVED	FRMNAME
1126	ID0719	EMPL	EXP	486	A2			REMOVE	REMOVED	EMPL
1127	ID0719	INQTC/GCAPR2011	TRU	525	C1			REMOVE	NONE	INQ
1128	ID0719	INQURSJUL2010	EXP	486	C1			REMOVE	REMOVED	INQ
1129	ID0720	CHASEX2130	EFX	613	B5			ALTER	AY	A
1130	ID0720	CHASEX2130	TRU	650	B5			ALTER	AY	A
1131	ID0720	CHASEX2130DUP	TRU	650	F1			REMOVE	REMOVED	A
1132	ID0720	GMACX6442	EFX	613	B5			ALTER	NONE	A
1133	ID0720	GMACX6442	TRU	650	B5			ALTER	NONE	A
1134	ID0720	GMACX6442DUP	TRU	650	F1			REMOVE	REMOVED	A
1135	ID0720	MEDCOLL\$20	EXP	564	D3			ALTER	NONE	COLLMED
1136	ID0720	MEDCOLL\$25	EXP	564	D3			ALTER	NONE	COLLMED
1137	ID0720	PREVADD5104	EFX	613	A1			REMOVE	REMOVED	PREADD
1138	ID0720	PREVADD5104	EXP	564	A1			REMOVE	REMOVED	PREADD
1139	ID0720	PREVADD5104	TRU	650	A1			REMOVE	REMOVED	PREADD
1140	ID0720	PRTAXLIENMAR1996	TRU	650	E2			ALTER	REMOVED	PR
1141	ID0721	CERTEGY	EFX	719	B1			REMOVE	REMOVED	TLCOLL
1142	ID0721	CITI	TRU	699	B4	F5		REMOVE	REMOVED	REV
1143	ID0724	ALLY	EXP	648	B2			ALTER	AY	A
1144	ID0724	FLAMINGO	EFX	613	B5			ALTER	NONE	A
1145	ID0727	ACCESSJUNE1999	EXP	630	D3			ALTER	NONE	COLL
1146	ID0727	ATTFEB2004	EFX	631	B2	B6	B5	ALTER	REMOVED	OPEN
1147	ID0727	ATTFEB2004	TRU	545	B2	B6	B5	ALTER	REMOVED	OPEN
1148	ID0727	COMCASTJUL2008	EFX	631	D1			REMOVE	REMOVED	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1149	ID0727	COMCASTJUL2008	EXP	630	D1			REMOVE	REMOVED	COLL
1150	ID0727	ERSOLUTIONSSEP2007	EXP	630	D1			REMOVE	REMOVED	COLL
1151	ID0727	LVNVJAN2007	TRU	545	B1			REMOVE	REMOVED	TLCOLL
1152	ID0727	LVNVSEP2006	EFX	631	B1			REMOVE	REMOVED	TLCOLL
1153	ID0727	LVNVSEP2006	EXP	630	B1			REMOVE	REMOVED	TLCOLL
1154	ID0727	LVNVSEP2006	TRU	545	B1			REMOVE	NONE	TLCOLL
1155	ID0727	NCOFINNOV2007	EXP	630	D3			ALTER	REMOVED	COLL
1156	ID0727	PREVADD	TRU	545	A1			REMOVE	REMOVED	PREADD
1157	ID0727	RJMDEC2009	EXP	630	D3			ALTER	REMOVED	COLL
1158	ID0737	CAPONESEP2008	EFX	533	B1			REMOVE	UNKNOWN	REV
1159	ID0737	CAPONESEP2008	EXP	503	B1			REMOVE	NONE	REV
1160	ID0737	CAPONESEP2008	TRU	508	B1			REMOVE	NONE	REV
1161	ID0737	PREVADD6533	EFX	533	A1			REMOVE	UNKNOWN	PREADD
1162	ID0737	PREVADD6533	EXP	503	A1			REMOVE	REMOVED	PREADD
1163	ID0737	PREVADD6533	TRU	508	A1			REMOVE	REMOVED	PREADD
1164	ID0739	CHASEOCT1998	EFX	779	B9			REMOVE	REMOVED	REV
1165	ID0739	CHASEOCT1998	EXP	779	B9			REMOVE	REMOVED	REV
1166	ID0739	CHASEOCT1998	TRU	781	B9			REMOVE	REMOVED	REV
1167	ID0740	DOE	EFX	579	B2			ALTER	NONE	ED
1168	ID0740	TNDHS	EFX	579	B2			ALTER	AY	OBL
1169	ID0740	TNDHS	EXP	512	B2			ALTER	AY	OBL
1170	ID0741	FNBOMAHA	EXP	701	B2			ALTER	REMOVED	REV
1171	ID0741	FNBOMAHA	TRU	782	B2			ALTER	REMOVED	REV
1172	ID0750	AMEXJUNE2000	EXP	618	B5			ALTER	NONE	REV
1173	ID0750	AMEXMARCH2000	EXP	618	B5			ALTER	REMOVED	REV
1174	ID0750	BBTFEB2004	EFX	576	B5			ALTER	NONE	REV
1175	ID0750	BBTFEB2004	EXP	618	B5			ALTER	AY	REV
1176	ID0750	BOFAAUG2004	EXP	618	B5			ALTER	NONE	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1177	ID0750	BOFAJUNE2000	EXP	618	B5			ALTER	NONE	REV
1178	ID0750	BOFAMAY19999	EXP	618	B5			ALTER	NONE	REV
1179	ID0750	COLLECTSEP2008	EFX	576	D1			REMOVE	REMOVED	COLLMED
1180	ID0750	COLLECTSEP2009	EFX	576	D1			REMOVE	NONE	COLLMED
1181	ID0750	COLLECTSEP2009	TRU	584	D1			REMOVE	REMOVED	COLLMED
1182	ID0750	GRANITESEP2009	TRU	584	B1			REMOVE	REMOVED	TLCOLL
1183	ID0750	HSBCAPRIL2007	EFX	576	B4			ALTER	REMOVED	REV
1184	ID0750	HSBCAPRIL2007	TRU	584	B4			ALTER	REMOVED	REV
1185	ID0750	PREVADD627	EFX	576	A1			REMOVE	REMOVED	PREADD
1186	ID0750	RESURGENTSEP2009	EFX	576	B1			REMOVE	REMOVED	TLCOLL
1187	ID0750	TIMEWARNERDEC2008	EFX	576	D1			REMOVE	REMOVED	COLL
1188	ID0750	TIMEWARNERDEC2008	EXP	618	D1			REMOVE	REMOVED	COLL
1189	ID0750	TIMEWARNERDEC2008	TRU	584	D1			REMOVE	REMOVED	COLL
1190	ID0754	BOFAJAN4	EXP	683	C1			REMOVE	REMOVED	INQ
1191	ID0754	BOFAJAN5	TRU	677	C1			REMOVE	REMOVED	INQ
1192	ID0755	COLLAUG2005\$284	EXP	469	D1			REMOVE	NONE	COLLMED
1193	ID0755	COLLAUG2005\$284	TRU	502	D1			REMOVE	REMOVED	COLLMED
1194	ID0755	COLLBABCOCK	EXP	469	D1			REMOVE	REMOVED	COLL
1195	ID0755	COLLBABCOCK	TRU	502	D1			REMOVE	REMOVED	COLL
1196	ID0755	COLLCOLHSE	EXP	469	D1			REMOVE	NONE	COLL
1197	ID0755	COLLCOLHSE	TRU	502	D1			REMOVE	REMOVED	COLL
1198	ID0755	COLLDEC2005\$415	EFX	464	D1			REMOVE	REMOVED	COLLMED
1199	ID0755	COLLDEC2005\$415	EXP	469	D1			REMOVE	REMOVED	COLLMED
1200	ID0755	COLLDEC2005\$415	TRU	502	D1			REMOVE	REMOVED	COLLMED
1201	ID0755	COLLFEB2010\$320	EFX	464	D1			REMOVE	NONE	COLLMED
1202	ID0755	COLLFEB2010\$320	EXP	469	D1			REMOVE	NONE	COLLMED
1203	ID0755	COLLFEB2010\$320	TRU	502	D1			REMOVE	REMOVED	COLLMED
1204	ID0755	COLLJUL2005\$55	EXP	469	D1			REMOVE	NONE	COLLMED

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1205	ID0755	COLLJUL2005\$55	TRU	502	D1			REMOVE	REMOVED	COLLMED
1206	ID0755	COLLJUL2005\$65	EFX	464	D1			REMOVE	NONE	COLLMED
1207	ID0755	COLLJUL2005\$65	EXP	469	D1			REMOVE	NONE	COLLMED
1208	ID0755	COLLJUL2005\$65	TRU	502	D1			REMOVE	REMOVED	COLLMED
1209	ID0755	COLLJUL2007\$277	EXP	469	D1			REMOVE	NONE	COLLMED
1210	ID0755	COLLJUL2007\$277	TRU	502	D1			REMOVE	REMOVED	COLLMED
1211	ID0755	COLLOCT2006\$444	EFX	464	D1			REMOVE	NONE	COLLMED
1212	ID0755	COLLOCT2006\$444	EXP	469	D1			REMOVE	NONE	COLLMED
1213	ID0755	COLLOCT2006\$444	TRU	502	D1			REMOVE	REMOVED	COLLMED
1214	ID0755	COLLWESTBAYACQ	EFX	464	D1			REMOVE	REMOVED	COLL
1215	ID0755	COLLWESTBAYACQ	EXP	469	D1			REMOVE	NONE	COLL
1216	ID0755	COLLWESTBAYACQ	TRU	502	D1			REMOVE	REMOVED	COLL
1217	ID0755	INQ1STFEDJAN222010	EFX	464	C1			REMOVE	REMOVED	INQ
1218	ID0755	INQCAPONEOCT82010	EFX	464	C1			REMOVE	NONE	INQ
1219	ID0755	INQCHASESEP42010	EFX	464	C1			REMOVE	NONE	INQ
1220	ID0755	INQCHLDSEP42010	EFX	464	C1			REMOVE	NONE	INQ
1221	ID0755	INQCPSSEP42010	EFX	464	C1			REMOVE	NONE	INQ
1222	ID0755	INQCRAPR122010	TRU	502	C1			REMOVE	REMOVED	INQ
1223	ID0755	INQCREDCONOV52010	EFX	464	C1			REMOVE	REMOVED	INQ
1224	ID0755	INQDSCHEVSEP42010	EFX	464	C1			REMOVE	NONE	INQ
1225	ID0755	INQDSMAY192010	TRU	502	C1			REMOVE	REMOVED	INQ
1226	ID0755	INQDSMAY2010	EXP	469	C1			REMOVE	REMOVED	INQ
1227	ID0755	INQLSSENOV152010	TRU	502	C1			REMOVE	NONE	INQ
1228	ID0755	INQMCLVNBUICKNOCV122010	EFX	464	C1			REMOVE	NONE	INQ
1229	ID0755	INQNICHOLASNOV92010	EFX	464	C1			REMOVE	NONE	INQ
1230	ID0755	INQPROFFINNOV92010	EFX	464	C1			REMOVE	NONE	INQ
1231	ID0755	INQPROFFINSEP132010	EFX	464	C1			REMOVE	NONE	INQ
1232	ID0755	INQQUALITYLEANOV182010	EFX	464	C1			REMOVE	NONE	INQ

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1233	ID0755	INQUIRYSANTANDEROCT82010	EFX	464	C1			REMOVE	NONE	INQ
1234	ID0755	INQVERIZON	EXP	469	C1			REMOVE	REMOVED	INQ
1235	ID0767	CITIDEC05	EFX	683	B1			REMOVE	REMOVED	REV
1236	ID0767	CITIDEC05	EXP	747	B1			REMOVE	REMOVED	REV
1237	ID0767	CITIDEC05	TRU	647	B1			REMOVE	REMOVED	REV
1238	ID0767	CITIED04	TRU	647	B4			ALTER	AP	ED
1239	ID0767	CITIED05	TRU	647	B4			ALTER	AP	ED
1240	ID0774	DISCOVERDEC2000	EFX	709	B5	B7		ALTER	REMOVED	REV
1241	ID0774	DISCOVERDEC2000	EXP	715	B5	B7		ALTER	REMOVED	REV
1242	ID0774	DISCOVERDEC2000	TRU	691	B5	B7		ALTER	REMOVED	REV
1243	ID0776	HSBC	TRU	676	B2			ALTER	REMOVED	REV
1244	ID0782	FIRSTSEP2009	EFX	528	B1			REMOVE	NONE	REVTLCOLL
1245	ID0782	FIRSTSEP2009	EXP	566	B1			REMOVE	NONE	REV
1246	ID0782	FIRSTSEP2009	TRU	595	B1			REMOVE	NONE	REV
1247	ID0788	SALUTEMAR2008	EFX	618	B2			ALTER	REMOVED	REV
1248	ID0788	SALUTEMAR2008	EXP	613	B2			ALTER	REMOVED	REV
1249	ID0788	TAXLIENX4099	EFX	618	E1			REMOVE	NONE	PR
1250	ID0788	TAXLIENX4101	EFX	618	E1			REMOVE	NONE	PR
1251	ID0788	TIMWARNERAUG2007	EFX	618	D1			REMOVE	NONE	COLL
1252	ID0788	TIMWARNERAUG2007	EXP	613	D1			REMOVE	NONE	COLL
1253	ID0788	TINWARNEROCT2006	EFX	618	D1			REMOVE	NONE	COLL
1254	ID0788	TRIBUTEMAR2008	EFX	618	B2			ALTER	REMOVED	REV
1255	ID0788	TRIBUTEMAR2008	EXP	613	B2			ALTER	REMOVED	REV
1256	ID0791	DILLARDSAPR1988	EFX	686	B1			REMOVE	REMOVED	REV
1257	ID0791	INQRESOURCEBK	EFX	686	C1			REMOVE	REMOVED	INQ
1258	ID0791	LOWESNOV2003	EFX	686	B1			REMOVE	REMOVED	REV
1259	ID0797	AACJAN2009	EFX	598	B1			REMOVE	NONE	TLCOLL
1260	ID0797	AACJAN2009	EXP	561	B1			REMOVE	NONE	TLCOLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1261	ID0797	BMGJAN2010	EXP	561	D3			ALTER	REMOVED	COLL
1262	ID0797	BMGJAN2010	TRU	579	D3			ALTER	REMOVED	COLL
1263	ID0797	CAPONEJAN2009	TRU	579	D1			REMOVE	NONE	COLL
1264	ID0797	CURRADD	TRU	579	A1			ALTER	NONE	CURRADD
1265	ID0797	EMPL	EXP	561	A2			REMOVE	REMOVED	EMPL
1266	ID0797	EMPL	TRU	579	A2			REMOVE	REMOVED	EMPL
1267	ID0797	FBVINOV1999	EFX	598	B1			REMOVE	NONE	REV
1268	ID0797	FBVINOV1999	TRU	579	F1			REMOVE	NONE	REV
1269	ID0797	FRMNAME	EXP	561	A1			REMOVE	REMOVED	FRMNAME
1270	ID0797	FRMNAME	TRU	579	A1			REMOVE	REMOVED	FRMNAME
1271	ID0797	MCMNOV2008	EXP	561	B1			REMOVE	NONE	TLCOLL
1272	ID0797	NATIONWIDSESEP2006	EXP	561	D3			ALTER	REMOVED	COLL
1273	ID0797	NATIONWIDSESEP2006	TRU	579	D1			REMOVE	REMOVED	COLL
1274	ID0797	NEWPORTNEWS	EXP	561	B2			ALTER	REMOVED	REV
1275	ID0797	PREADD	EFX	598	A1			REMOVE	REMOVED	PREADD
1276	ID0797	PREADD	EXP	561	A1			REMOVE	REMOVED	PREADD
1277	ID0797	PREADD	TRU	579	A1			REMOVE	NONE	PREADD
1278	ID0797	SSTMAR2004	EFX	598	B1			REMOVE	NONE	TLCOLL
1279	ID0797	SSTMAR2004	EXP	561	B1			REMOVE	NONE	REV
1280	ID0797	SSTMAR2004	TRU	579	B1			REMOVE	NONE	REV
1281	ID0797	WALMAY2004	EFX	598	B7			ALTER	NONE	REV
1282	ID0797	WALMAY2004	EXP	561	B7			ALTER	AY	REV
1283	ID0797	WALMAY2004	TRU	579	B7			ALTER	AY	REV
1284	ID0797	WFNNBFB	TRU	579	B2			ALTER	AY	REV
1285	ID0801	BOFAFEB2000	TRU	766	B1			REMOVE	NONE	REV
1286	ID0801	FORMERNAME	EXP	797	A1			REMOVE	REMOVED	FRMNAME
1287	ID0801	ZIONOCT2006	EFX	776	B5			ALTER	AY	HEL
1288	ID0801	ZIONOCT2006	TRU	766	B5			ALTER	AY	HEL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1289	ID0806	COLLECTFEB2009	EXP	666	D1			REMOVE	NONE	COLLMED
1290	ID0806	COLLECTFEB2009	TRU	680	D1			REMOVE	REMOVED	COLLMED
1291	ID0806	COLLECTFEB2010	EFX	637	D1			REMOVE	NONE	COLLMED
1292	ID0806	COLLECTFEB2010	EXP	666	D1			REMOVE	NONE	COLLMED
1293	ID0806	COLLECTFEB2010	TRU	680	D1			REMOVE	REMOVED	COLLMED
1294	ID0806	COLLECTMAR2007	EFX	637	D1			REMOVE	NONE	COLLMED
1295	ID0806	COLLECTMAR2007	EXP	666	D1			REMOVE	NONE	COLLMED
1296	ID0806	COLLECTMAR2007	TRU	680	D1			REMOVE	REMOVED	COLLMED
1297	ID0806	COLLECTNOV2009	EFX	637	D1			REMOVE	NONE	COLLMED
1298	ID0806	COLLECTNOV2009	EXP	666	D1			REMOVE	NONE	COLLMED
1299	ID0806	COLLECTNOV2009	TRU	680	D1			REMOVE	REMOVED	COLLMED
1300	ID0806	COLLECTOCT2009	EFX	637	D1			REMOVE	AP	COLLMED
1301	ID0806	COLLECTOCT2009	EXP	666	D1			REMOVE	AP	COLLMED
1302	ID0806	COLLECTOCT2009	TRU	680	D1			REMOVE	REMOVED	COLLMED
1303	ID0806	COLLECTOCT2010	EFX	637	D1			REMOVE	REMOVED	COLLMED
1304	ID0806	COLLECTOCT2010	EXP	666	D1			REMOVE	AP	COLLMED
1305	ID0806	COLLECTSEP2009182	EFX	637	D1			REMOVE	NONE	COLLMED
1306	ID0806	COLLECTSEP2009182	EXP	666	D1			REMOVE	NONE	COLLMED
1307	ID0806	COLLECTSEP2009182	TRU	680	D1			REMOVE	REMOVED	COLLMED
1308	ID0806	COLLECTSEP2009266	TRU	680	D1			REMOVE	REMOVED	COLLMED
1309	ID0806	COLLECTSEP2009267	EFX	637	D1			REMOVE	NONE	COLLMED
1310	ID0806	COLLECTSEP2009267	EXP	666	D1			REMOVE	NONE	COLLMED
1311	ID0806	TRANSAMERICAMAY2001	TRU	680	B1			REMOVE	NONE	REV
1312	ID0807	AMEXAPR1989	TRU	785	B23			ALTER	REMOVED	REV
1313	ID0807	AMEXMAR1989	TRU	785	B23			ALTER	REMOVED	REV
1314	ID0807	NAMEINITIAL	EFX	802	A1			ALTER	AY	NAME
1315	ID0807	PREVADD	EFX	802	A1			ALTER	AP	PREADD
1316	ID0807	PREVADD	EXP	801	A1			ALTER	AP	PREADD



**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1317	ID0807	PREVADD	TRU	785	A1			ALTER	REMOVED	PREADD
1318	ID0810	AFNIBL	EFX	537	B1			REMOVE	NONE	TLCOLL
1319	ID0810	AT&T9084	EXP	582	B1			REMOVE	NONE	REV
1320	ID0810	AT&T9084	TRU	609	B1			REMOVE	REMOVED	REV
1321	ID0810	CARFINSVCS	EFX	537	B2			ALTER	AY	A
1322	ID0810	CARFINSVCS	EXP	582	B2			ALTER	AY	A
1323	ID0810	CARFINSVCS	TRU	609	B2			ALTER	AY	A
1324	ID0810	COLL8833	EXP	582	D2			ALTER	NONE	COLL
1325	ID0810	COLL8833	TRU	609	D2			ALTER	NONE	COLL
1326	ID0810	COLL8834	EXP	582	D2			ALTER	NONE	COLL
1327	ID0810	COLL8834	TRU	609	D2			ALTER	NONE	COLL
1328	ID0810	COLL8997	EXP	582	D2			ALTER	NONE	COLL
1329	ID0810	COLL8997	TRU	609	D2			ALTER	NONE	COLL
1330	ID0810	COLLAUG2006\$271	EFX	537	D1			REMOVE	NONE	COLLMED
1331	ID0810	COLLAUG2006\$271	EXP	582	D1			REMOVE	NONE	COLLMED
1332	ID0810	COLLAUG2006\$271	TRU	609	D1			REMOVE	NONE	COLLMED
1333	ID0810	COLLSEP2008\$3598	EFX	537	D1			REMOVE	REMOVED	COLLMED
1334	ID0810	COLLSEP2008\$3598	TRU	609	D1			REMOVE	REMOVED	COLLMED
1335	ID0810	COLLVERIZON	EXP	582	D1			REMOVE	NONE	COLL
1336	ID0810	COLLVERIZON	TRU	609	D1			REMOVE	NONE	COLL
1337	ID0810	INQMAB	EXP	582	C1			REMOVE	NONE	INQ
1338	ID0810	INQMAB	TRU	609	C1			REMOVE	REMOVED	INQ
1339	ID0810	UNKTLSEP2007\$233	EFX	537	B2	D1		REMOVE	NONE	TLCOLLMED
1340	ID0811	COLLMPD\$119APR2004	EXP	658	D3			ALTER	REMOVED	COLLMED
1341	ID0811	COLLMPD\$720APR2004	EXP	658	D3			ALTER	REMOVED	COLLMED
1342	ID0811	INQTMCC	EFX	694	C1			REMOVE	REMOVED	INQ
1343	ID0819	NEXTCARD	TRU	737	B2			ALTER	NONE	REV
1344	ID0821	HSBCAUG2006	TRU	693	B4			ALTER	AY	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1345	ID0828	CHASEMAR2006	TRU	791	F1			REMOVE	REMOVED	HEL
1346	ID0828	CITISEP2000A	EFX	797	B7			ALTER	AY	REV
1347	ID0828	CITISEP2000A	EXP	812	B7			ALTER	AY	REV
1348	ID0828	CITISEP2000A	TRU	791	B7			ALTER	AY	REV
1349	ID0828	CITISEP2000B	EFX	797	B7			ALTER	AY	REV
1350	ID0828	CITISEP2000B	EXP	812	B7			ALTER	AY	REV
1351	ID0828	CITISEP2000B	TRU	791	B7			ALTER	AY	REV
1352	ID0828	FORMERNAME	TRU	791	A1			REMOVE	REMOVED	FRMNAME
1353	ID0828	WFBJAN1997	EFX	797	F1			REMOVE	NONE	REV
1354	ID0830	COLLSPRINTSEP2009	EFX	646	D1			REMOVE	NONE	COLL
1355	ID0830	COLLSPRINTSEP2009	TRU	659	D1			REMOVE	NONE	COLL
1356	ID0830	DREXELU	EFX	646	B5			ALTER	NONE	ED
1357	ID0830	NISSINFI	EFX	646	B2			ALTER	AY	A
1358	ID0835	FRMNAME	EXP	631	A1			REMOVE	NONE	FRMNAME
1359	ID0835	TAXLIENMAR1992	EFX	570	E1			REMOVE	REMOVED	PR
1360	ID0839	INQVRSFEB092010	TRU	685	C1			REMOVE	REMOVED	INQ
1361	ID0839	INQVRSFEB232010	TRU	685	C1			REMOVE	REMOVED	INQ
1362	ID0839	INQVRSMAR152010	TRU	685	C1			REMOVE	REMOVED	INQ
1363	ID0840	DEPTOFEDDEC2008	EFX	650	B4			ALTER	NONE	ED
1364	ID0840	DEPTOFEDDEC2008	EXP	691	B4			ALTER	NONE	ED
1365	ID0840	DEPTOFEDDEC2008	TRU	688	B4			ALTER	NONE	ED
1366	ID0843	WCC\$17730APR2005	EXP	753	B2			ALTER	AY	MRTG
1367	ID0843	WCC\$69833APR2005	EXP	753	B2			ALTER	AY	MRTG
1368	ID0856	TFCAPR2007	TRU	526	F1			REMOVE	REMOVED	A
1369	ID0857	HONDAJUL2006	EFX	713	B5	B7		ALTER	AP	A
1370	ID0857	HONDAJUL2006	EXP	719	B5	B7		ALTER	AP	A
1371	ID0857	HONDAJUL2006	TRU	718	B5	B7		ALTER	AP	A
1372	ID0857	HONDAJUL2006B	EXP	719	F1			REMOVE	AP	A

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1373	ID0863	UI	EXP	702	B2			ALTER	REMOVED	INST
1374	ID0864	AFNIBLOOMJAN2010	EFX	605	B1			REMOVE	NONE	TLCOLL
1375	ID0864	AFNIBLOOMJAN2010	EXP	573	D1			REMOVE	AP	COLL
1376	ID0864	AFNIBLOOMJAN2010	TRU	600	D1			REMOVE	NONE	COLL
1377	ID0864	COLLECTAUG2004	EXP	573	D3	D4		ALTER	REMOVED	COLL
1378	ID0864	COLLECTJUL2006	EFX	605	D1			REMOVE	NONE	COLLMED
1379	ID0864	COLLECTNOV2004	EXP	573	D1			REMOVE	REMOVED	COLLMED
1380	ID0864	COLLECTOCT2008	EFX	605	D3			ALTER	NONE	COLLMED
1381	ID0864	COLLECTOCT2008	EXP	573	D3			ALTER	NONE	COLLMED
1382	ID0864	DEPTOFEDMAR2009	EXP	573	B2			ALTER	NONE	ED
1383	ID0864	DEPTOFEDMAR2009	TRU	600	B2			ALTER	NONE	ED
1384	ID0864	DEPTOFEDMAR2009B	EXP	573	F1			REMOVE	NONE	ED
1385	ID0864	DFSMARCH2010	EXP	573	B3			ALTER	NONE	REV
1386	ID0864	DFSMARCH2010	TRU	600	B3			ALTER	NONE	REV
1387	ID0864	IMAGINEAPR2007	EFX	605	B2			ALTER	AY	REV
1388	ID0864	PREVADD	EFX	605	A1			REMOVE	REMOVED	PREADD
1389	ID0866	FSBBANKCARDAPR1999	EXP	830	B1			REMOVE	REMOVED	REV
1390	ID0866	MIDOREGONAUG1998	EXP	830	F1			REMOVE	NONE	REV
1391	ID0866	MIDOREGONFEB2003	EXP	830	F1			REMOVE	REMOVED	REV
1392	ID0868	CITISEP2003	EXP	702	B4			ALTER	AY	MRTG
1393	ID0868	CITISEP2003	TRU	684	B4			ALTER	AY	MRTG
1394	ID0869	CAPONEAPR2007	EFX	553	B4			ALTER	UNKNOWN	REV
1395	ID0869	CAPONEAPR2007	EXP	582	B4			ALTER	NONE	REV
1396	ID0869	CAPONEAPR2007	TRU	627	B4			ALTER	NONE	REV
1397	ID0869	CHASEOCT2005	EFX	553	B4			ALTER	UNKNOWN	REV
1398	ID0869	CHASEOCT2005	EXP	582	B4			ALTER	NONE	REV
1399	ID0869	CHRYSLER	EFX	553	B4			ALTER	UNKNOWN	A
1400	ID0869	CHRYSLER	EXP	582	B4			ALTER	NONE	A

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1401	ID0869	COLLAUG2005\$85	EFX	553	D1			REMOVE	UNKNOWN	COLLMED
1402	ID0869	COLLAUG2005\$85	EXP	582	D1			REMOVE	REMOVED	COLLMED
1403	ID0869	COLLCH	EXP	582	D1			REMOVE	NONE	COLL
1404	ID0869	COLLCH	TRU	627	D1			REMOVE	REMOVED	COLL
1405	ID0869	COLLDEC2005\$265	EFX	553	D1			REMOVE	UNKNOWN	COLLMED
1406	ID0869	COLLDEC2005\$265	EXP	582	D1			REMOVE	NONE	COLLMED
1407	ID0869	COLLDEC2005\$265	TRU	627	D1			REMOVE	REMOVED	COLLMED
1408	ID0869	COLLKYUTILITY	EFX	553	D1			REMOVE	UNKNOWN	COLL
1409	ID0869	COLLOCT2004\$175	EFX	553	D1			REMOVE	UNKNOWN	COLLMED
1410	ID0869	COLLOCT2004\$175	EXP	582	D1			REMOVE	REMOVED	COLLMED
1411	ID0869	COLLRPA	EFX	553	D1			REMOVE	UNKNOWN	COLL
1412	ID0869	COLLRPA	TRU	627	D1			REMOVE	NONE	COLL
1413	ID0869	CORTRUST	EFX	553	B4			ALTER	UNKNOWN	REV
1414	ID0869	CORTRUST	EXP	582	B4			ALTER	NONE	REV
1415	ID0869	CURADD	TRU	627	A1			ALTER	NONE	ADD
1416	ID0869	CURADDPREADD	EFX	553	A1			ALTER	UNKNOWN	ADD
1417	ID0869	CURADDPREADD	EXP	582	A1			ALTER	NONE	ADD
1418	ID0869	FPBFEB2007	EXP	582	B4			ALTER	NONE	REV
1419	ID0869	FPBNOV2004	EXP	582	B4			ALTER	NONE	REV
1420	ID0869	HSBCJAN20071	EFX	553	B4			ALTER	UNKNOWN	REV
1421	ID0869	HSBCJAN20072	EFX	553	B4			ALTER	UNKNOWN	REV
1422	ID0869	JEFFERSNCPJAN2009	EFX	553	G1			ALTER	UNKNOWN	TLCOLL
1423	ID0869	JEFFERSNCPJAN2009	EXP	582	B1			REMOVE	NONE	REV
1424	ID0869	NELNETOCT2001	EFX	553	B4			ALTER	UNKNOWN	ED
1425	ID0869	NELNETOCT2001	EXP	582	B4			ALTER	NONE	ED
1426	ID0869	PLAINSCOMM	EFX	553	G1			REMOVE	UNKNOWN	REV
1427	ID0869	PLAINSCOMM	EXP	582	B4			ALTER	NONE	REV
1428	ID0869	PLAINSCOMM	TRU	627	G1			REMOVE	NONE	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1429	ID0869	PORTFOLIODEC2008	EFX	553	G1			ALTER	UNKNOWN	TLCOLL
1430	ID0869	PORTFOLIOJAN2009	EFX	553	G1			ALTER	UNKNOWN	TLCOLL
1431	ID0869	SM0080JUL2008	EFX	553	F1			REMOVE	UNKNOWN	ED
1432	ID0869	SM0090APR2009	EFX	553	F1			REMOVE	UNKNOWN	ED
1433	ID0869	SM0090APR2009B	EFX	553	F1			REMOVE	UNKNOWN	ED
1434	ID0869	SM0090FEB2009	EFX	553	F1			REMOVE	UNKNOWN	ED
1435	ID0869	SM0227FEB2009	EXP	582	F1			REMOVE	NONE	ED
1436	ID0869	SM0407APR2009	EXP	582	F1			REMOVE	NONE	ED
1437	ID0869	SM0407APR2009B	EXP	582	F1			REMOVE	NONE	ED
1438	ID0869	SM0707JUL2008	EXP	582	F1			REMOVE	NONE	ED
1439	ID0869	UOFPSEP2007	EFX	553	G1			ALTER	UNKNOWN	TLCOLL
1440	ID0869	UOFPSEP2007	EXP	582	B4			ALTER	NONE	ED
1441	ID0870	TARGETOCT2004	EFX	562	F1			REMOVE	NONE	REV
1442	ID0870	TARGETOCT2004	EXP	542	F1			REMOVE	NONE	REV
1443	ID0872	COLLECTION106	EFX	456	D3			ALTER	REMOVED	COLLMED
1444	ID0872	COLLECTION106	EXP	539	D3			ALTER	REMOVED	COLLMED
1445	ID0872	COLLECTION106	TRU	476	D3			ALTER	REMOVED	COLLMED
1446	ID0872	COLLECTION144	EFX	456	D3			ALTER	REMOVED	COLLMED
1447	ID0872	COLLECTION144	EXP	539	D3			ALTER	REMOVED	COLLMED
1448	ID0872	COLLECTION144	TRU	476	D3			ALTER	REMOVED	COLLMED
1449	ID0872	COLLECTION159	EFX	456	D3			ALTER	NONE	COLLMED
1450	ID0872	COLLECTION159	TRU	476	D3			ALTER	NONE	COLLMED
1451	ID0872	COLLECTION67	EXP	539	D3			ALTER	NONE	COLLMED
1452	ID0872	COLLECTION67	TRU	476	D3			ALTER	REMOVED	COLLMED
1453	ID0874	CURRADD	EFX	752	A1			REMOVE	REMOVED	CURRADD
1454	ID0874	FIRSTINTERSTATEAUG2004	TRU	761	B1			REMOVE	REMOVED	ED
1455	ID0874	TARGETJUL2001	EXP	781	B24			ALTER	REMOVED	REV
1456	ID0874	THDMAY2003	EFX	752	B7			ALTER	REMOVED	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1457	ID0874	THDMAY2003	EXP	781	B7			ALTER	REMOVED	REV
1458	ID0874	ZALESMAY2000	EXP	781	B7			ALTER	REMOVED	REV
1459	ID0875	BOFAMRTG9512	EFX	480	B5	B6		ALTER	AY	MRTG
1460	ID0875	BOFAMRTG9512	EXP	569	B5	B6		ALTER	AY	MRTG
1461	ID0875	BOFAMRTG9512	TRU	523	B5	B6		ALTER	AY	MRTG
1462	ID0877	CHASE2936	EFX	690	B4			ALTER	REMOVED	A
1463	ID0877	CHASE2936	TRU	673	B4			ALTER	REMOVED	A
1464	ID0877	COLLMRASEP2006	EFX	690	D1			REMOVE	NONE	COLL
1465	ID0877	COLLMRASEP2006	TRU	673	D1			REMOVE	NONE	COLL
1466	ID0877	GMAC5744	EFX	690	B4			ALTER	REMOVED	MRTG
1467	ID0877	GMAC5744	EXP	702	B4			ALTER	AY	MRTG
1468	ID0877	GMAC5744	TRU	673	B4			ALTER	AY	MRTG
1469	ID0877	INQFDCS/CSI	EXP	702	C1			REMOVE	NONE	INQ
1470	ID0878	SEARSJUL2005	EFX	602	B2	B5	B6	ALTER	REMOVED	REV
1471	ID0878	SEARSJUL2005	TRU	602	B2	B5	B6	ALTER	AY	REV
1472	ID0879	CAPITALONEMAR2010	TRU	712	F1			REMOVE	REMOVED	REV
1473	ID0883	COLLMAR2009	EFX	676	D1			REMOVE	AP	COLLMED
1474	ID0885	STBK MAY2006	EFX	564	B5			ALTER	NONE	REV
1475	ID0885	STBK MAY2006	EXP	539	B5			ALTER	NONE	REV
1476	ID0885	STBK MAY2006	TRU	564	B5			ALTER	NONE	REV
1477	ID0886	COLLOCT2007	EFX	716	D1			REMOVE	NONE	COLLMED
1478	ID0901	CURRADD	TRU	769	A1			ALTER	NONE	CURRADD
1479	ID0901	FSTTENMAY2003	TRU	769	F1			REMOVE	NONE	HEL
1480	ID0903	CLCJUNE2007	EFX	563	B2	B7		ALTER	NONE	ED
1481	ID0903	ICMOCT2007	EXP	631	F4			REMOVE	REMOVED	COLL
1482	ID0910	FORMERNAME	TRU	571	A1			REMOVE	REMOVED	FRMNAME
1483	ID0910	WINCOMAY2010	EFX	543	D1			REMOVE	NONE	COLL
1484	ID0911	COLLCOX2134	EFX	530	D3			ALTER	REMOVED	COLL

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1485	ID0911	COLLCOX2134	EXP	569	D3			ALTER	REMOVED	COLL
1486	ID0911	COLLMAR2011\$58	EFX	530	D1			REMOVE	REMOVED	COLLMED
1487	ID0911	COLLMAR2011\$58	EXP	569	D1			REMOVE	REMOVED	COLLMED
1488	ID0911	COLLMAR2011\$58	TRU	552	D1			REMOVE	REMOVED	COLLMED
1489	ID0911	COLLMAR2011\$731	EFX	530	D1			REMOVE	REMOVED	COLLMED
1490	ID0911	COLLMAR2011\$731	EXP	569	D1			REMOVE	REMOVED	COLLMED
1491	ID0911	COLLMAR2011\$731	TRU	552	D1			REMOVE	REMOVED	COLLMED
1492	ID0911	COLLNOV2010\$1819	EXP	569	D1			REMOVE	REMOVED	COLLMED
1493	ID0911	DFASJUN2009	EFX	530	B1			REMOVE	NONE	TLCOLL
1494	ID0911	DFASJUN2009	EXP	569	B1			REMOVE	NONE	TLCOLL
1495	ID0911	DFASJUN2009	TRU	552	B1			REMOVE	NONE	TLCOLL
1496	ID0911	INQDCSJUL2010	EXP	569	C1			REMOVE	REMOVED	INQ
1497	ID0923	COLLJUN2006\$180	EFX	668	D3			ALTER	NONE	COLLMED
1498	ID0923	INQAM/LANDS	TRU	676	C1			REMOVE	NONE	INQ
1499	ID0924	HSBCNOV1995	TRU	715	B1			REMOVE	REMOVED	REV
1500	ID0926	ARROWSER	EFX	475	B1			REMOVE	REMOVED	TLCOLL
1501	ID0926	COLLECTAUG2007	EXP	537	D1			REMOVE	NONE	COLL
1502	ID0926	COLLECTDEC2008	EXP	537	D1			REMOVE	NONE	COLL
1503	ID0926	COLLECTMAY2007	EXP	537	D1			REMOVE	NONE	COLL
1504	ID0926	FIRSTPREMIERE	TRU	571	B1			REMOVE	NONE	REV
1505	ID0926	HSBCAUG2005A	TRU	571	B1			REMOVE	NONE	REV
1506	ID0926	HSBCAUG2005B	TRU	571	B1			REMOVE	NONE	REV
1507	ID0926	HSBCBANKAUG2005284	TRU	571	B1			REMOVE	NONE	REV
1508	ID0926	HSBCBANKAUG2005422	TRU	571	B1			REMOVE	NONE	REV
1509	ID0926	HSBCBANKJUL2007	TRU	571	B1			REMOVE	NONE	REV
1510	ID0926	HSBCBANKSEP2004	TRU	571	B1			REMOVE	NONE	REV
1511	ID0926	HSBCJUL2007	TRU	571	B1			REMOVE	NONE	REV
1512	ID0926	HSBCNOV2004	TRU	571	B1			REMOVE	NONE	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1513	ID0926	PORTFOLIO	EFX	475	B1			REMOVE	NONE	TLCOLL
1514	ID0926	SEVENTHAVEFEB2010	TRU	571	B1			REMOVE	NONE	REV
1515	ID0926	SHARPERIMAGEMAY2006	EFX	475	D1			REMOVE	NONE	COLL
1516	ID0926	SHELLOCT2004	EFX	475	B2	B5	B6	ALTER	NONE	REV
1517	ID0926	SHELLOCT2004	TRU	571	B2	B5	B6	ALTER	NONE	REV
1518	ID0927	COMMUNBKJUN302010	EFX	759	C1			REMOVE	REMOVED	INQ
1519	ID0927	VSBMRTG6500	TRU	709	B5			ALTER	AY	MRTG
1520	ID0936	COMCASTJUNE2005	EXP	539	D1			REMOVE	REMOVED	COLL
1521	ID0937	FORMERNAME	EFX	588	A1			REMOVE	REMOVED	FRMNAME
1522	ID0937	FORMERNAME	EXP	576	A1			REMOVE	REMOVED	FRMNAME
1523	ID0937	FORMERNAME	TRU	570	A1			REMOVE	REMOVED	FRMNAME
1524	ID0937	GEMONEYBANKAPR2010	TRU	570	D1			REMOVE	NONE	COLL
1525	ID0937	GEMONEYBANKAUG2009	TRU	570	D1			REMOVE	NONE	COLL
1526	ID0937	GEMONEYBANKAUG2010	EXP	576	D1			REMOVE	NONE	COLL
1527	ID0937	GEMONEYBANKJUL2009\	TRU	570	D1			REMOVE	NONE	COLL
1528	ID0937	GEMONEYBANKJUL2010	EFX	588	D1			REMOVE	NONE	COLL
1529	ID0937	GEMONEYBANKJUL2010	EXP	576	D1			REMOVE	NONE	COLL
1530	ID0937	GEMONEYBANKJUL2010	TRU	570	D1			REMOVE	NONE	COLL
1531	ID0937	VERIZONJULY2007	EFX	588	B1			REMOVE	NONE	TLCOLL
1532	ID0937	VERIZONJULY2007	EXP	576	B1			REMOVE	NONE	TLCOLL
1533	ID0937	VERIZONJULY2007	TRU	570	B1			REMOVE	NONE	TLCOLL
1534	ID0943	COLLECTIONFEB2007	TRU	581	D1			REMOVE	REMOVED	COLL
1535	ID0943	COLLECTIONMAY2006	TRU	581	D1			REMOVE	REMOVED	COLL
1536	ID0943	COLLECTIONOCT2006	TRU	581	D1			REMOVE	REMOVED	COLL
1537	ID0943	DISHAPR2007	EFX	530	D1			REMOVE	NONE	COLL
1538	ID0943	DISHAPR2007	EXP	582	D1			REMOVE	NONE	COLL
1539	ID0943	DISHAPR2007	TRU	581	D1			REMOVE	NONE	COLL
1540	ID0943	PINNACLEOCT2007	EXP	582	B1			REMOVE	REMOVED	INST



**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1541	ID0943	PROGRESSIVEJAN2006	TRU	581	D3			ALTER	NONE	COLL
1542	ID0944	ALLIANCEONEJUNE2008	EXP	697	D1			REMOVE	REMOVED	COLL
1543	ID0944	ALLIANCEONEJUNE2008	TRU	704	D1			REMOVE	REMOVED	COLL
1544	ID0944	FORMERNAME	EFX	698	A1			REMOVE	REMOVED	FRMNAME
1545	ID0944	HOMEDEPOT	EFX	698	D1			REMOVE	REMOVED	COLL
1546	ID0944	HOMEDEPOT	EXP	697	D1			REMOVE	REMOVED	COLL
1547	ID0944	HOMEDEPOT	TRU	704	D1			REMOVE	REMOVED	COLL
1548	ID0945	EDFINANCIALX0001	TRU	725	B2			ALTER	AY	ED
1549	ID0945	EDFINANCIALX0002	TRU	725	B2			ALTER	AY	ED
1550	ID0945	EDFINANCIALX0005	TRU	725	B2			ALTER	AY	ED
1551	ID0945	EDFINANCIALX0006	TRU	725	B2			ALTER	AY	ED
1552	ID0945	GUTTERGUARDMAY2008	TRU	725	A1			REMOVE	NONE	REV
1553	ID0946	CHASE	TRU	462	B1			REMOVE	NONE	REV
1554	ID0946	CHASEJUL2006	EFX	571	B1			REMOVE	NONE	REV
1555	ID0946	CURRENTADD	EXP	585	A1			REMOVE	NONE	CURRADD
1556	ID0946	HOMEDEPOTJUL2006	TRU	462	B1			REMOVE	NONE	REV
1557	ID0946	PINNACLEJUL2010	EXP	585	D1			REMOVE	NONE	COLL
1558	ID0946	PINNACLEJUL2010	TRU	462	D1			REMOVE	NONE	COLL
1559	ID0946	SEARS	TRU	462	B1			REMOVE	NONE	REV
1560	ID0946	SEARSDEC2003	EFX	571	B1			REMOVE	NONE	REV
1561	ID0949	AFNI	EFX	639	B1			REMOVE	REMOVED	TLCOLL
1562	ID0949	AFNI	EXP	671	D1			REMOVE	REMOVED	COLL
1563	ID0949	AFNI	TRU	676	D1			REMOVE	REMOVED	COLL
1564	ID0949	COMCASTJUL2008	EXP	671	D1			REMOVE	REMOVED	COLL
1565	ID0949	COMCASTJUL2008	TRU	676	D1			REMOVE	REMOVED	COLL
1566	ID0949	GMACJUL1999	EXP	671	B5	B4		ALTER	AY	MRTG
1567	ID0949	MED1JAN2008	EXP	671	D1			REMOVE	NONE	COLLMED
1568	ID0949	MED1JAN2008	TRU	676	D1			REMOVE	NONE	COLLMED

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1569	ID0949	PREVADD	TRU	676	A1			REMOVE	REMOVED	PREADD
1570	ID0952	CHASEMRTG	EFX	788	B4			ALTER	NONE	MRTG
1571	ID0952	CHASEMRTG	TRU	758	B4			ALTER	NONE	MRTG
1572	ID0955	MACYSAPR2010	EFX	593	B4			ALTER	NONE	REV
1573	ID0955	MACYSAPR2010	EXP	553	B4			ALTER	NONE	REV
1574	ID0955	MACYSAPR2010	TRU	594	B4			ALTER	NONE	REV
1575	ID0955	USDOEF003	EXP	553	B2			ALTER	AY	ED
1576	ID0957	BACHOMEJUN2004	EFX	755	B4			ALTER	AY	MRTG
1577	ID0957	BACHOMEJUN2004	EXP	755	B4			ALTER	AY	MRTG
1578	ID0957	BACHOMEJUN2004	TRU	737	B4			ALTER	AY	MRTG
1579	ID0957	BESTBUYDEC2002	EFX	755	B4			ALTER	AY	REV
1580	ID0957	BESTBUYDEC2002	EXP	755	B4			ALTER	AY	REV
1581	ID0957	BESTBUYDEC2002	TRU	737	B4			ALTER	AY	REV
1582	ID0957	BESTBUYDEC2002B	EXP	755	F1			REMOVE	REMOVED	REV
1583	ID0966	DRESSBARNOCT2006	EFX	681	B1			REMOVE	REMOVED	REV
1584	ID0966	DRESSBARNOCT2006	EXP	721	B1			REMOVE	REMOVED	REV
1585	ID0966	DRESSBARNOCT2006	TRU	705	B1			REMOVE	REMOVED	REV
1586	ID0968	COLLCHEJUN2008	EXP	593	D1			REMOVE	NONE	COLL
1587	ID0974	COLLMSAUG2009	EXP	662	D1			REMOVE	REMOVED	COLL
1588	ID0976	FORMERNAME	EXP	685	A1			REMOVE	REMOVED	FRMNAME
1589	ID0976	FORMERNAME	TRU	679	A1			REMOVE	REMOVED	FRMNAME
1590	ID0976	HSBCNOV200111899	TRU	679	B2	B7		ALTER	AY	REV
1591	ID0976	HSBCNOV2001902	TRU	679	B2	B7		ALTER	AY	REV
1592	ID0976	INQJUN2010	EFX	696	C1			REMOVE	REMOVED	INQ
1593	ID0976	LACKSVALLEYAUG2008	EXP	685	B2	B7		ALTER	NONE	INST
1594	ID0976	NAME	EFX	696	A1			REMOVE	REMOVED	NAME
1595	ID0976	PREVADD	EFX	696	A1			REMOVE	REMOVED	PREVADD
1596	ID0977	WELLSFARGOJUN2008	EXP	769	B2			ALTER	REMOVED	INST

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1597	ID0983	TIMEWARNERX8633	EFX	554	D1			REMOVE	NONE	COLL
1598	ID0983	TIMEWARNERX8633	EXP	557	D1			REMOVE	NONE	COLL
1599	ID0983	TIMEWARNERX8633	TRU	575	D1			REMOVE	NONE	COLL
1600	ID0983	TIMEWARNERX8914	EFX	554	D1			REMOVE	NONE	COLL
1601	ID0983	TIMEWARNERX8914	EXP	557	D1			REMOVE	NONE	COLL
1602	ID0983	TIMEWARNERX8914	TRU	575	D1			REMOVE	NONE	COLL
1603	ID0984	FORMERNAMES	EFX	487	A1			REMOVE	REMOVED	FRMNAME
1604	ID0984	FORMERNAMES	EXP	486	A1			ALTER	AP	FRMNAME
1605	ID0984	FORMERNAMES	TRU	488	A1			ALTER	AP	FRMNAME
1606	ID0984	INQAPR12	TRU	488	C1			REMOVE	REMOVED	INQ
1607	ID0984	INQAPR9	EXP	486	C1			REMOVE	REMOVED	INQ
1608	ID0984	INQAUG17	EXP	486	C1			REMOVE	NONE	INQ
1609	ID0984	INQAUG2	TRU	488	C1			REMOVE	NONE	INQ
1610	ID0984	INQFEB1	EXP	486	C1			REMOVE	NONE	INQ
1611	ID0984	INQFEB2	TRU	488	C1			REMOVE	NONE	INQ
1612	ID0984	INQJAN7	EXP	486	C1			REMOVE	NONE	INQ
1613	ID0984	INQJUL26	TRU	488	C1			REMOVE	NONE	INQ
1614	ID0984	INQJUL29	EFX	487	C1			REMOVE	REMOVED	INQ
1615	ID0984	INQMAR12	TRU	488	C1			REMOVE	REMOVED	INQ
1616	ID0984	INQMAR16	TRU	488	C1			REMOVE	REMOVED	INQ
1617	ID0984	INQMAR17	TRU	488	C1			REMOVE	REMOVED	INQ
1618	ID0984	INQMAR22	TRU	488	C1			REMOVE	REMOVED	INQ
1619	ID0984	INQMAY18	TRU	488	C1			REMOVE	REMOVED	INQ
1620	ID0984	INQMAY28	TRU	488	C1			REMOVE	REMOVED	INQ
1621	ID0984	INQSEP24	TRU	488	C1			REMOVE	NONE	INQ
1622	ID0984	INQSEP7	TRU	488	C1			REMOVE	NONE	INQ
1623	ID0984	INQSEP8	EXP	486	C1			REMOVE	NONE	INQ
1624	ID0984	NAME	EXP	486	A1			ALTER	NONE	NAME

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1625	ID0984	NAME	TRU	488	A1			ALTER	NONE	NAME
1626	ID0987	COLLECTOCT2010	EFX	548	D1			REMOVE	NONE	COLLMED
1627	ID0987	COLLECTOCT2010	EXP	586	D1			REMOVE	NONE	COLLMED
1628	ID0987	COLLECTOCT2010	TRU	598	D1			REMOVE	NONE	COLLMED
1629	ID0987	COMCASTJUN2011	EFX	548	D1			REMOVE	NONE	COLL
1630	ID0987	COMCASTJUN2011	TRU	598	D1			REMOVE	NONE	COLL
1631	ID0987	COMCASTMAY2010	EFX	548	F4			REMOVE	REMOVED	COLL
1632	ID0987	COMCASTMAY2010	EXP	586	D1			REMOVE	REMOVED	COLL
1633	ID0993	COLLAT&T	EFX	426	D3			ALTER	REMOVED	COLL
1634	ID0994	BOFAMAR2004	EFX	669	B2	B6		ALTER	REMOVED	REV
1635	ID0994	CITISEP1994	EFX	669	B2	B6		ALTER	REMOVED	REV
1636	ID0994	CITISEP1994	TRU	688	B2	B6		ALTER	REMOVED	REV
1637	ID0995	KOHLAUG2005	EXP	743	B4			ALTER	NONE	REVCH
1638	ID0995	WFM0844	EXP	743	B2	B5		ALTER	AY	MRTG
1639	ID0995	WFM0844	TRU	691	B2	B5		ALTER	AY	MRTG
1640	ID0998	COLECTSEP2009	EFX	593	D1			REMOVE	NONE	COLLMED
1641	ID0998	COLECTSEP2009	EXP	546	D1			REMOVE	NONE	COLLMED
1642	ID0998	COLECTSEP2009	TRU	604	D1			REMOVE	NONE	COLLMED
1643	ID0998	COLLECTDEC2007	EFX	593	B1			REMOVE	REMOVED	TLCOLL
1644	ID0998	COLLECTDEC2007	EXP	546	D1			REMOVE	REMOVED	COLLMED
1645	ID0998	COLLECTDEC2007	TRU	604	D1			REMOVE	REMOVED	COLLMED
1646	ID0998	COLLECTMAY2007	EFX	593	D1			REMOVE	REMOVED	COLLMED
1647	ID0998	COLLECTMAY2007	EXP	546	D1			REMOVE	NONE	COLLMED
1648	ID0998	COLLECTMAY2007	TRU	604	D1			REMOVE	NONE	COLLMED
1649	ID0998	NEXTCARDMAY2001	TRU	604	B1			REMOVE	REMOVED	REV
1650	ID0998	PENNCREDITJUL2010	EXP	546	D1			REMOVE	NONE	COLL
1651	ID0999	HFCSEP2006	EFX	588	B2	B6	B5	ALTER	AY	REV
1652	ID0999	HFCSEP2006	EXP	576	B2	B6	B5	ALTER	AY	REV

**Table 58 - Nature of Changes Requested and Changes Made for Each Reported Item Disputed at Each Bureau**

Obs	Masked ID	Masked Item ID	Bureau where Disputed	Original FICO Score	1st Error	2nd error	3rd error	Requested Action	Actual Action by Bureau	Type of Reported Item
1653	ID0999	HFCSEP2006	TRU	577	B2	B6	B5	ALTER	AY	REV
1654	ID0999	WILSHIREMAR2006	EFX	588	B2	B6	B5	ALTER	REMOVED	MRTG
1655	ID0999	WILSHIREMAR2006	EXP	576	B2	B6	B5	ALTER	REMOVED	MRTG
1656	ID0999	WILSHIREMAR2006	TRU	577	B2	B6	B5	ALTER	REMOVED	MRTG

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
1	ID0003	AMEXSEP2007			ALTER			Removed	Yes
2	ID0008	CJAPRIL2010		REMOVE	REMOVE		Removed	Not Changed	NO
3	ID0016	ALLIANCEX7797		REMOVE			Not Changed		Yes
4	ID0019	GRANT&WEBERX1899		REMOVE			Not Changed		Yes
5	ID0019	GRANT&WEBERX1900		REMOVE			Not Changed		Yes
6	ID0019	GRANTMERCANTILEAGEX06T7		REMOVE			Not Changed		Yes
7	ID0019	GREENTREENOV1998	REMOVE	REMOVE		Removed	Removed		Yes
8	ID0019	HIGHLANDSDEC2005			REMOVE			Removed	Yes
9	ID0020	182YCJAN2007	REMOVE			Not Changed			Yes
10	ID0020	FRESNBCCOLJAN2007			REMOVE			Removed	Yes
11	ID0022	DOEX9341	ALTER		ALTER	Not Changed		Not Changed	Yes
12	ID0022	DOEX9342	ALTER		ALTER	Not Changed		Not Changed	Yes
13	ID0022	VERIZONJUN2008	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
14	ID0023	PRX0018		REMOVE	REMOVE		Removed	Not Changed	NO
15	ID0023	PRX2093	REMOVE	REMOVE	REMOVE	Removed	Removed	Not Changed	NO
16	ID0024	BURDINESMCYFDSBAPR1985			ALTER			Removed	Yes
17	ID0024	BURDINESMCYFDSBOCT1984			ALTER			Removed	Yes
18	ID0024	FORMERNAME			REMOVE			Removed	Yes
19	ID0024	FRMRNAME1		REMOVE			Removed		Yes
20	ID0024	FRMRNAME2		REMOVE			Not Changed		Yes
21	ID0026	TRIADFINCLJAN2004	ALTER			Altered Fully			Yes
22	ID0027	BANKOFTHEWESTJULY1995		ALTER			Not Changed		Yes
23	ID0027	FORMERNAME	REMOVE			Not Changed			Yes
24	ID0027	FORMERNAME1		REMOVE			Removed		Yes
25	ID0027	FORMERNAME2		REMOVE			Removed		Yes
26	ID0027	SDMEDICALFDEROLFEB2002		ALTER			Not Changed		Yes
27	ID0029	224MORTGAGES/MORTGAGESVCAPRIL6,201			REMOVE			Removed	Yes
28	ID0039	COLL\$159MAR2007		REMOVE	REMOVE		Not Changed	Not Changed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
29	ID0039	COLL\$168JUL2008		REMOVE	REMOVE		Removed	Removed	Yes
30	ID0039	COLL\$206NOV2005		REMOVE			Not Changed		Yes
31	ID0039	COLL\$20APR2006		REMOVE			Removed		Yes
32	ID0039	COLL\$386APR2006		REMOVE	REMOVE		Removed	Removed	Yes
33	ID0039	COLL\$51JAN2007		REMOVE	REMOVE		Removed	Removed	Yes
34	ID0039	COLL\$677SEP2007		REMOVE	REMOVE		Removed	Removed	Yes
35	ID0039	COLL\$75OCT2007		REMOVE	REMOVE		Removed	Removed	Yes
36	ID0039	COLL\$79JUL2006		REMOVE	REMOVE		Removed	Removed	Yes
37	ID0039	COLL\$79OCT2008	REMOVE			Removed			Yes
38	ID0039	COLL\$96APR2006		REMOVE	REMOVE		Removed	Removed	Yes
39	ID0039	PR\$5010DEC2008		REMOVE	REMOVE		Not Changed	Not Changed	Yes
40	ID0039	PRNO.594VC10590DEC2008	REMOVE			Not Changed			Yes
41	ID0040	PRBKRPTCYAPR5		REMOVE			Removed		Yes
42	ID0041	AMERICASSEX4801	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
43	ID0045	CHASEMRTGEDEC2001		ALTER			Not Changed		Yes
44	ID0052	CABANAROYALARMSDEC2003			ALTER			Removed	Yes
45	ID0052	MEDFORDPROPERTYCOOCT2004			REMOVE			Removed	Yes
46	ID0052	ONESPIRITBOOKCLUBDEC2010		REMOVE	REMOVE		Not Changed	Not Changed	Yes
47	ID0054	PORSCHEX8446	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
48	ID0057	CHASEMAR2004		ALTER			Not Changed		Yes
49	ID0060	ACS/NELNETEDUCATIONJAN2003		REMOVE			Not Changed		Yes
50	ID0060	ACSEDSERVAUGUST2,2010	REMOVE			Not Changed			Yes
51	ID0060	BCSERVICESJULY2008		REMOVE			Removed		Yes
52	ID0060	QVZGAUG2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
53	ID0061	BOFAJUN2000	REMOVE			Removed			Yes
54	ID0074	CRDTFIRSTFEB2004		REMOVE	REMOVE		Not Changed	Not Changed	Yes
55	ID0074	CREDITFIRSTFEB2004	REMOVE			Not Changed			Yes
56	ID0074	MILITARYFCUFEB2004	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
57	ID0083	WFNTHEBUCKLEMAY2005			ALTER			Removed	Yes
58	ID0089	AMERICAX4661	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
59	ID0089	BKMARCH2005	ALTER			Altered Fully			Yes
60	ID0089	CITIFINANCIALX7735	ALTER	ALTER		Altered Partly	Altered Fully		NO
61	ID0089	HSBCJULY2004	ALTER		ALTER	Removed		Altered Fully	NO
62	ID0089	INQUIRY10/2010		REMOVE			Not Changed		Yes
63	ID0089	INQUIRY3/2010		REMOVE			Removed		Yes
64	ID0089	INQUIRY6/2010		REMOVE			Removed		Yes
65	ID0089	PORTFOLIOX9666	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
66	ID0089	THDJULY2003		ALTER			Removed		Yes
67	ID0089	WELLSFARGOX2896	ALTER	ALTER	ALTER	Altered Fully	Altered Partly	Removed	NO
68	ID0089	WFFINANCEFEB2003		ALTER			Altered Fully		Yes
69	ID0089	WFM/WBMX2095		ALTER			Not Changed		Yes
70	ID0091	GMACX8877	ALTER		ALTER	Not Changed		Not Changed	Yes
71	ID0091	NAME		ALTER	ALTER		Not Changed	Not Changed	Yes
72	ID0094	ADDRESS		ALTER	ALTER		Not Changed	Not Changed	Yes
73	ID0094	COLL\$131DEC2005		REMOVE			Removed		Yes
74	ID0094	WFNNB/NY&CAUG2005		ALTER			Removed		Yes
75	ID0095	COLLCITIBANKMAR2008			REMOVE			Removed	Yes
76	ID0098	ADDRESS		ALTER			Altered Fully		Yes
77	ID0098	USFFCUX0001			ALTER			Removed	Yes
78	ID0104	AHFJUN2002	ALTER	ALTER		Altered Fully	Altered Fully		Yes
79	ID0105	SNJHEA5018		ALTER			Not Changed		Yes
80	ID0107	DOEX2601	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Removed	NO
81	ID0107	PROGRESSIVEDEC2006		REMOVE	REMOVE		Removed	Removed	Yes
82	ID0107	SOMERPOINTOCT2010		REMOVE	REMOVE		Not Changed	Removed	NO
83	ID0107	STATEOFMIX2639		ALTER			Not Changed		Yes
84	ID0115	COLLAPJUN2005		REMOVE	REMOVE		Removed	Removed	Yes



Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
85	ID0115	COLLBCCCAPR2009	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Removed	NO
86	ID0115	COLLMSCJAN2010		REMOVE	REMOVE		Not Changed	Removed	NO
87	ID0118	COLLFTOCT2006	REMOVE	REMOVE		Removed	Removed		Yes
88	ID0119	CJX3606			ALTER			Altered Fully	Yes
89	ID0121	PREVADD		REMOVE			Removed		Yes
90	ID0121	WFX8404	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
91	ID0127	COLL1256SEP2009	REMOVE			Not Changed			Yes
92	ID0130	CBAGA\$12		REMOVE			Removed		Yes
93	ID0130	CBAGA\$15		REMOVE			Removed		Yes
94	ID0130	HOLLYWOOD\$109			REMOVE			Removed	Yes
95	ID0130	MARRIETTA\$15	REMOVE			Removed			Yes
96	ID0130	MARRIETTA\$30	REMOVE			Removed			Yes
97	ID0130	MEDCOLL\$172	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
98	ID0130	PRX2556	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
99	ID0130	WPGX2988	REMOVE			Removed			Yes
100	ID0139	HOMESM2255DEC2003	ALTER	ALTER		Removed	Removed		Yes
101	ID0141	SPRINTDEC2007	REMOVE			Removed			Yes
102	ID0144	BOFANOV2001		ALTER			Not Changed		Yes
103	ID0144	CHASEMAY1998		ALTER			Not Changed		Yes
104	ID0144	COLLMED1MAR2007			REMOVE			Removed	Yes
105	ID0144	FUSADEC1998		ALTER			Not Changed		Yes
106	ID0144	GEMB/TIGERJAN2000	ALTER	ALTER		Not Changed	Not Changed		Yes
107	ID0144	VISADSNBMAR2008	ALTER	ALTER		Not Changed	Not Changed		Yes
108	ID0146	MACYSDEC2009	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Removed	NO
109	ID0149	INQUIRIESJULY2010			REMOVE			Removed	Yes
110	ID0152	CAPONEJUN2004	REMOVE		REMOVE	Removed		Removed	Yes
111	ID0154	CHASEJUL2005	ALTER			Not Changed			Yes
112	ID0155	COLLECTION\$121JUL2005	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
113	ID0155	COLLECTION\$200FEB2005		REMOVE	REMOVE		Removed	Removed	Yes
114	ID0155	COLLECTION\$400MAR2005	REMOVE	REMOVE		Removed	Removed		Yes
115	ID0155	COLLECTION\$75SEP2006	REMOVE	REMOVE		Not Changed	Not Changed		Yes
116	ID0155	FORMERNAME		REMOVE	REMOVE		Removed	Removed	Yes
117	ID0155	MAINSTCORPNOV2009	REMOVE	REMOVE		Altered Partly	Removed		NO
118	ID0155	PRCASENO.40168JUL2005		REMOVE			Removed		Yes
119	ID0156	COLLECTION\$105JAN2008		REMOVE	REMOVE		Removed	Removed	Yes
120	ID0163	CHASE			ALTER			Removed	Yes
121	ID0163	CITBMLINQJUN2010	REMOVE			Removed			Yes
122	ID0163	MERITECHSAXON8166	ALTER	ALTER		Altered Fully	Altered Fully		Yes
123	ID0163	SST/COL5427	ALTER	ALTER	ALTER	Removed	Not Changed	Not Changed	NO
124	ID0164	TLAUG1993	REMOVE			Not Changed			Yes
125	ID0167	COLLECTIONWFNAPR2010		REMOVE	REMOVE		Removed	Removed	Yes
126	ID0167	INQUIRYCITMNLJUL2010	REMOVE			Removed			Yes
127	ID0167	INQUIRYRPMJUL2010			REMOVE			Removed	Yes
128	ID0167	INQUIRYSPRNGLFFINMAR2011	REMOVE			Not Changed			Yes
129	ID0169	BACHOMELNSX7603	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
130	ID0169	PINNACLEAUG2009	REMOVE			Removed			Yes
131	ID0171	WFNNB/RMPLJAN2003	ALTER			Removed			Yes
132	ID0174	COLLFEB2009\$216		ALTER			Altered Fully		Yes
133	ID0174	COLLJAN2009\$112		ALTER			Altered Fully		Yes
134	ID0174	COLLJAN2009\$1348		ALTER			Altered Fully		Yes
135	ID0174	COLLJAN2009\$54		ALTER			Altered Fully		Yes
136	ID0174	COLLJUL2008\$215		ALTER			Altered Fully		Yes
137	ID0174	MEDCOLLDEC2008	ALTER	ALTER		Removed	Altered Fully		NO
138	ID0174	MEDCOLLFEB2009			ALTER			Removed	Yes
139	ID0174	MEDIACOMCOLL	ALTER		ALTER	Removed		Removed	Yes
140	ID0179	DIRECTVMAY2008	REMOVE			Not Changed			Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
141	ID0182	INQUIRYSTERLING	REMOVE			Removed			Yes
142	ID0191	LVNVAUG2008	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
143	ID0192	INQBARCLAYS			REMOVE			Not Changed	Yes
144	ID0193	AMEXMAR\$1683	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Removed	NO
145	ID0193	AMEXMAR\$286			REMOVE			Not Changed	Yes
146	ID0193	AMEXMAR\$817	REMOVE		REMOVE	Removed		Not Changed	NO
147	ID0193	BOFAMAR2005			REMOVE			Not Changed	Yes
148	ID0193	MACYSMAY2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
149	ID0193	MAYCSAUGUST2004	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
150	ID0193	NAME			ALTER			Not Changed	Yes
151	ID0194	VWCREDITMARCH2022	ALTER		ALTER	Altered Fully		Altered Fully	Yes
152	ID0204	BARCLAYSBKDEC2008	REMOVE			Removed			Yes
153	ID0205	CAPONEOCT2004	ALTER		ALTER	Not Changed		Not Changed	Yes
154	ID0205	CHASEJAN2006	REMOVE		REMOVE	Removed		Removed	Yes
155	ID0205	CURRADD	REMOVE		REMOVE	Not Changed		Not Changed	Yes
156	ID0205	FRMRNAME	REMOVE			Removed			Yes
157	ID0205	NAME			REMOVE			Not Changed	Yes
158	ID0205	SPRINTCOLLFEB2010	REMOVE			Not Changed			Yes
159	ID0205	SST/CIGPFLJAN2006	REMOVE		REMOVE	Not Changed		Altered Partly	NO
160	ID0205	SSTCOLUMBJAN2006	REMOVE		REMOVE	Altered Partly		Altered Partly	Yes
161	ID0209	BLMDSSEP2000		REMOVE			Not Changed		Yes
162	ID0209	BOFAJUL2007		REMOVE			Removed		Yes
163	ID0209	CBFEB2010		REMOVE			Removed		Yes
164	ID0209	DFSJAN2007		REMOVE			Removed		Yes
165	ID0209	EMPL		REMOVE			Removed		Yes
166	ID0209	FMBDEC2001		REMOVE			Removed		Yes
167	ID0209	FNAMEADD		REMOVE			Removed		Yes
168	ID0209	HSBCFEB2006		REMOVE			Removed		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
169	ID0209	HSBCSEP2003		REMOVE			Removed		Yes
170	ID0209	RNB-FIELDS		REMOVE			Removed		Yes
171	ID0213	PFCU	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
172	ID0214	CAPONEJUL2004			ALTER			Not Changed	Yes
173	ID0214	CURRADD	ALTER		ALTER	Not Changed		Not Changed	Yes
174	ID0214	FEDLOANX0001	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
175	ID0214	NATIONWIDECOLLJAN2008			REMOVE			Not Changed	Yes
176	ID0215	BOFAJAN2006	ALTER		ALTER	Altered Fully		Altered Fully	Yes
177		SMDEC2007			ALTER			Unknown	Yes
178		SMMAR2007	ALTER			Unknown			Yes
179	ID0217	BOFAMAR1990	REMOVE	REMOVE	REMOVE	Removed	Removed	Not Changed	NO
180	ID0217	PREVADD4280	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
181	ID0217	PREVADD4837	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
182	ID0221	CHASE-CHASEP2010		REMOVE			Not Changed		Yes
183	ID0226	AMEXX1843			ALTER			Removed	Yes
184	ID0226	CURRADD		REMOVE			Removed		Yes
185	ID0226	PREVADD15	REMOVE		REMOVE	Removed		Removed	Yes
186	ID0226	PREVADD214			REMOVE			Removed	Yes
187	ID0226	PREVADD69	REMOVE			Not Changed			Yes
188	ID0231	BCINSTMAY2007		ALTER			Not Changed		Yes
189	ID0231	CBAUG2001		ALTER			Altered Differently		Yes
190	ID0231	FNAMEPREADD		REMOVE			Not Changed		Yes
191	ID0231	HSMRTG		ALTER			Not Changed		Yes
192	ID0231	PREVADD	REMOVE			Not Changed			Yes
193	ID0231	SANTANDERAUG2006		ALTER			Removed		Yes
194	ID0231	WFALNOV2007		ALTER			Not Changed		Yes
195	ID0233	USBANKOCT2007	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
196	ID0233	WSUSL		ALTER			Removed		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
197	ID0234	ALLIANCEONEOCT2007		REMOVE	REMOVE		Removed	Removed	Yes
198	ID0234	NCOFIN22COLLAUG2009	REMOVE	REMOVE	REMOVE	Unknown	Removed	Removed	NO
199	ID0242	AKSTLOANX0002	ALTER			Removed			Yes
200	ID0242	AKSTLOANX0003	ALTER			Removed			Yes
201	ID0242	AKSTLOANX0004	ALTER			Removed			Yes
202	ID0242	AKSTLOANX0005	ALTER			Removed			Yes
203	ID0242	WELLSFARGOX0001			ALTER			Removed	Yes
204	ID0246	MRTGAPR2004STATUS	ALTER			Not Changed			Yes
205	ID0246	OLSMRTGAPR2004		ALTER			Altered Partly		Yes
206	ID0250	COLLFCOCT2010	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
207	ID0253	AT&TINQ	REMOVE			Removed			Yes
208	ID0253	LVNVNOV2007	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Not Changed	NO
209	ID0253	NAME	ALTER			Altered Fully			Yes
210	ID0255	COLLMED102			REMOVE			Removed	Yes
211	ID0255	GEL&T		REMOVE	REMOVE		Removed	Removed	Yes
212	ID0260	BOFAMARCH2003		ALTER			Not Changed		Yes
213	ID0260	BOFAOCT2002		ALTER			Not Changed		Yes
214	ID0260	CHASEJAN1994		REMOVE			Removed		Yes
215	ID0262	HSBCJUNE2007	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
216	ID0262	PREVADD13800		REMOVE	REMOVE		Removed	Removed	Yes
217	ID0262	PREVADD3240	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Removed	NO
218	ID0262	WFBOCT2008	REMOVE		REMOVE	Removed		Not Changed	NO
219	ID0271	LORCH	REMOVE			Removed			Yes
220	ID0274	BACHOMELOANSX5486	ALTER			Not Changed			Yes
221	ID0274	BACHOMELOANSX5494	ALTER	ALTER	ALTER	Altered Partly	Altered Partly	Altered Partly	Yes
222	ID0274	BOFAAPR2005	ALTER		ALTER	Not Changed		Altered Fully	NO
223	ID0274	BOFAAUG2007	ALTER		ALTER	Altered Fully		Not Changed	NO
224	ID0274	WEENERGIESAPR2009	ALTER	ALTER	ALTER	Not Changed	Removed	Removed	NO

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
225	ID0274	WELLSFARGOCT2005	REMOVE			Not Changed			Yes
226	ID0274	WELLSX0001	ALTER			Removed			Yes
227	ID0275	BOFA8724		REMOVE	REMOVE		Removed	Not Changed	NO
228	ID0275	COPPING			REMOVE			Not Changed	Yes
229	ID0278	ADD		ALTER			Not Changed		Yes
230	ID0278	CURRADD1711	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
231	ID0278	NCCINQUIRY			REMOVE			Not Changed	Yes
232	ID0283	COLL6363	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
233	ID0283	COLLJUL2007	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Removed	NO
234	ID0284	MDOFCS			ALTER			Altered Fully	Yes
235	ID0290	CHASE4686	ALTER	ALTER		Not Changed	Not Changed		Yes
236	ID0291	AMERICREDIT		ALTER			Altered Fully		Yes
237	ID0291	CAPONEAUG2003		ALTER			Altered Fully		Yes
238	ID0291	CAPONEDEC2004		ALTER			Altered Fully		Yes
239	ID0291	CHASESEP2004		ALTER			Altered Fully		Yes
240	ID0291	COLLMPD		REMOVE			Removed		Yes
241	ID0291	GEMBAUG2005	ALTER	ALTER		Altered Fully	Altered Fully		Yes
242	ID0291	IBERIABANK		ALTER			Altered Fully		Yes
243	ID0291	MRTG4006APR1997	ALTER	ALTER	ALTER	Removed	Altered Fully	Altered Fully	NO
244	ID0294	ADELPHIAX6079	REMOVE	REMOVE		Removed	Removed		Yes
245	ID0294	CENTURYLINK	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
246	ID0294	COLLECTION\$4153	REMOVE		REMOVE	Not Changed		Not Changed	Yes
247	ID0294	COXX1704	REMOVE	REMOVE		Not Changed	Not Changed		Yes
248	ID0294	COXX1705	REMOVE	REMOVE		Not Changed	Not Changed		Yes
249	ID0294	INDIANTRACE		REMOVE	REMOVE		Removed	Removed	Yes
250	ID0294	LAMONTHANLEY		REMOVE			Not Changed		Yes
251	ID0294	USAFUNDS1X7062	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
252	ID0294	USAFUNDS2X7062	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
253	ID0298	FNAME			REMOVE			Removed	Yes
254	ID0298	INQAT&T	REMOVE			Removed			Yes
255	ID0298	INQFACTUAL	REMOVE			Removed			Yes
256	ID0298	PREADD	REMOVE			Not Changed			Yes
257	ID0299	VILLAGEOFNORTMAY2009	REMOVE		REMOVE	Not Changed		Not Changed	Yes
258	ID0300	NEXTCARDMAY2001			ALTER			Removed	Yes
259	ID0304	CHASENOV1998	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
260	ID0304	PROGMARCH2006		REMOVE	REMOVE		Not Changed	Not Changed	Yes
261	ID0306	CURADD		ALTER			Unknown		Yes
262	ID0306	NAME		ALTER	ALTER		Unknown	Unknown	Yes
263	ID0306	PREADD		REMOVE	REMOVE		Unknown	Unknown	Yes
264	ID0308	BOFAFEB2005	ALTER	ALTER	ALTER	Unknown	Altered Fully	Altered Fully	NO
265	ID0308	COLLMAR2006	REMOVE			Unknown			Yes
266	ID0308	GMAC1648	ALTER	ALTER	ALTER	Unknown	Altered Fully	Not Changed	NO
267	ID0308	INQKOHLS		REMOVE			Removed		Yes
268	ID0308	INQORCS	REMOVE			Unknown			Yes
269	ID0308	INQVENGROFF		REMOVE			Not Changed		Yes
270	ID0308	PREADD	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Removed	NO
271	ID0308	PRTL			REMOVE			Altered Fully	Yes
272	ID0321	BHLS7564	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
273	ID0322	CURRADD			ALTER			Altered Fully	Yes
274	ID0322	FPBAN2008		ALTER			Removed		Yes
275	ID0328	COLLCPPE			REMOVE			Not Changed	Yes
276	ID0331	COLLDCSEP2010		REMOVE	REMOVE		Not Changed	Not Changed	Yes
277	ID0331	COLLDEC2008	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
278	ID0332	1STDATAJULY2003	ALTER			Not Changed			Yes
279	ID0332	PREVADDWELLS	REMOVE			Not Changed			Yes
280	ID0338	CHASEMAR2003	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
281	ID0338	WFDS1085	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
282	ID0344	AACNOV2010	REMOVE	REMOVE		Not Changed	Not Changed		Yes
283	ID0344	CITIFINANCIALSEP2000			ALTER			Not Changed	Yes
284	ID0344	FHUT/METBKCOCT2007	REMOVE			Not Changed			Yes
285	ID0344	TAXLIEN0750			REMOVE			Not Changed	Yes
286	ID0344	TAXLIEN9545			REMOVE			Not Changed	Yes
287	ID0344	THD/CBSDFEB2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
288	ID0344	VERIZONOCT2005		ALTER			Removed		Yes
289	ID0348	AMEXDEC2010		REMOVE			Not Changed		Yes
290	ID0348	BACHOMELOANSSERVICINGAUGUST1996			REMOVE			Removed	Yes
291	ID0348	CONSUMERCREDITSCVSDEC2005			REMOVE			Removed	Yes
292	ID0348	EMPLOYFD			REMOVE			Removed	Yes
293	ID0348	GEMBWALMARTJUN2006			REMOVE			Removed	Yes
294	ID0348	HSBCAUTOFINFEB2002			REMOVE			Removed	Yes
295	ID0348	HSBCAUTOFINMAR2004			REMOVE			Removed	Yes
296	ID0348	HSBCBANKSEPT2003			REMOVE			Removed	Yes
297	ID0348	NAME		ALTER	ALTER		Not Changed	Not Changed	Yes
298	ID0348	NCOFIN/99		REMOVE			Removed		Yes
299	ID0348	PREADDHYATT			REMOVE			Removed	Yes
300	ID0348	PRIMUSFINANCIALSERVICEDEC1997			REMOVE			Not Changed	Yes
301	ID0349	CITIX9001	ALTER	ALTER	ALTER	Removed	Altered Fully	Removed	NO
302	ID0349	GREENTREEEX7108			REMOVE			Removed	Yes
303	ID0350	BOFAMORTG2523	ALTER	ALTER	ALTER	Altered Differently	Altered Differently	Altered Differently	Yes
304	ID0350	FCU1600	ALTER	ALTER	ALTER	Not Changed	Not Changed	Altered Fully	NO
305	ID0350	MARINERFIN	ALTER			Not Changed			Yes
306	ID0350	NOTE	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
307	ID0350	STATEFRM0001	ALTER	ALTER	ALTER	Not Changed	Altered Partly	Altered Fully	NO
308	ID0352	WFNNB/NYC&C	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes



Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
309	ID0356	AARONS\$1174			REMOVE			Not Changed	Yes
310	ID0356	AARONS\$2242			REMOVE			Not Changed	Yes
311	ID0356	AARONS\$2671			REMOVE			Not Changed	Yes
312	ID0356	AMERICASH\$1964		REMOVE	REMOVE		Not Changed	Not Changed	Yes
313	ID0356	CURPREADD	ALTER			Altered Fully			Yes
314	ID0356	FPBAUG2009	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
315	ID0356	JAN2007\$375			REMOVE			Removed	Yes
316	ID0356	JUL2005\$882			REMOVE			Removed	Yes
317	ID0356	JUN2005\$110			REMOVE			Removed	Yes
318	ID0356	OCT2009\$546			REMOVE			Not Changed	Yes
319	ID0356	OCT2010\$1174	REMOVE			Not Changed			Yes
320	ID0356	OCT2010\$2242	REMOVE			Not Changed			Yes
321	ID0356	OCT2010\$2671	REMOVE			Removed			Yes
322	ID0356	PAYLIANCE50		REMOVE			Removed		Yes
323	ID0356	UNKN\$110	REMOVE			Removed			Yes
324	ID0356	UNKN\$160	REMOVE			Not Changed			Yes
325	ID0356	UNKN\$375	REMOVE			Not Changed			Yes
326	ID0356	UNKN\$419	REMOVE			Removed			Yes
327	ID0356	UNKN\$546	REMOVE			Not Changed			Yes
328	ID0356	UNKN\$882	REMOVE			Not Changed			Yes
329	ID0358	BOFAMRTG6528	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
330	ID0370	COLL1072		REMOVE			Removed		Yes
331	ID0370	INQDEC182010			REMOVE			Removed	Yes
332	ID0370	INQJAN202010	REMOVE			Removed			Yes
333	ID0370	INQMAR22010		REMOVE			Removed		Yes
334	ID0370	INQSEP202010		REMOVE			Not Changed		Yes
335	ID0372	DISCOCT1995	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
336	ID0373	AT&TFEB2005	REMOVE			Removed			Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
337	ID0373	COLL\$150		REMOVE			Not Changed		Yes
338	ID0373	COLL\$178		REMOVE	REMOVE		Not Changed	Not Changed	Yes
339	ID0373	COLL\$187		REMOVE	REMOVE		Not Changed	Not Changed	Yes
340	ID0373	COLL\$221	ALTER	ALTER	ALTER	Removed	Not Changed	Removed	NO
341	ID0373	COLL\$357	ALTER	ALTER	ALTER	Removed	Not Changed	Removed	NO
342	ID0373	COLL\$546			REMOVE			Altered Fully	Yes
343	ID0373	FRMNAME		REMOVE	REMOVE		Not Changed	Not Changed	Yes
344	ID0373	NAME	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
345	ID0373	TRIBUTEAPR2008	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
346	ID0373	UBSJUN2008			REMOVE			Not Changed	Yes
347	ID0373	VERIZONSEP2007	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Not Changed	NO
348	ID0377	COLLKNOL	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
349	ID0386	COLLGMAC2007	REMOVE			Not Changed			Yes
350	ID0386	COLLGMAC2008	REMOVE			Not Changed			Yes
351	ID0392	INQJUL2010	REMOVE			Removed			Yes
352	ID0401	VERITASSEP2002	ALTER	ALTER		Not Changed	Not Changed		Yes
353	ID0402	COLLMAR2007		REMOVE			Removed		Yes
354	ID0403	CURRPREADD			ALTER			Altered Fully	Yes
355	ID0403	USWINMAY2004	ALTER		ALTER	Altered Fully		Removed	NO
356	ID0405	AT&TJUL2001	ALTER		ALTER	Not Changed		Removed	NO
357	ID0405	BOFAMRTGMAY2003	ALTER	ALTER	ALTER	Not Changed	Not Changed	Removed	NO
358	ID0405	FRMNAME			REMOVE			Removed	Yes
359	ID0405	PREADD		REMOVE			Not Changed		Yes
360	ID0407	INDEPENDENTBANKX0003	ALTER	ALTER	ALTER	Not Changed	Removed	Not Changed	NO
361	ID0407	WELDON\$1470		REMOVE			Removed		Yes
362	ID0407	WELDON\$2200	REMOVE			Removed			Yes
363	ID0407	WELDON\$4795		REMOVE			Removed		Yes
364	ID0408	ADVCOLLECTION			REMOVE			Removed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
365	ID0408	FRMRNAME			REMOVE			Removed	Yes
366	ID0408	NEWPORTNEWSAPR2005		REMOVE	REMOVE		Removed	Removed	Yes
367	ID0412	BARCLAYS	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
368	ID0412	BMW	ALTER	ALTER		Not Changed	Not Changed		Yes
369	ID0412	CHASE	ALTER	ALTER		Removed	Removed		Yes
370	ID0412	CITI		REMOVE			Removed		Yes
371	ID0412	ETHICON			REMOVE			Removed	Yes
372	ID0412	GEMBDILLARDS		REMOVE			Not Changed		Yes
373	ID0412	HSBC	ALTER		ALTER	Removed		Removed	Yes
374	ID0412	INQBOFA		REMOVE			Removed		Yes
375	ID0425	AFNIJUL2009	REMOVE			Removed			Yes
376	ID0425	ARROWSERSEP2008	REMOVE			Removed			Yes
377	ID0425	CNACFEB2008	ALTER	ALTER	ALTER	Not Changed	Not Changed	Removed	NO
378	ID0425	COLLAPR2008	REMOVE			Not Changed			Yes
379	ID0425	COLLCINCINATTIBELL	ALTER		ALTER	Not Changed		Removed	NO
380	ID0425	COLLCONTJUL2008			REMOVE			Not Changed	Yes
381	ID0425	COLLDESEC2010	ALTER			Not Changed			Yes
382	ID0425	COLLMPDAPR2008		REMOVE			Removed		Yes
383	ID0425	COLLPBSEP2008		REMOVE	REMOVE		Removed	Removed	Yes
384	ID0425	COLLPLCJUN2006		ALTER	ALTER		Removed	Removed	Yes
385	ID0425	COLLSPRJAN2010		REMOVE			Not Changed		Yes
386	ID0425	COLLTMJUL2009		REMOVE	REMOVE		Removed	Removed	Yes
387	ID0425	COLLTWCMAJ2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
388	ID0425	HSBCJAN2010	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
389	ID0425	LAMHANASSOC		REMOVE			Not Changed		Yes
390	ID0425	MAINSTCORPJUL2008	REMOVE	REMOVE		Not Changed	Not Changed		Yes
391	ID0425	RAMAY2002	ALTER	ALTER	ALTER	Not Changed	Not Changed	Altered Fully	NO
392	ID0427	FLEETCC			REMOVE			Removed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
393	ID0427	TEXASHIGHEREDX6991			ALTER			Altered Fully	Yes
394	ID0428	AIGFS	ALTER	ALTER		Removed	Unknown		NO
395	ID0430	LVNVJAN2008	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
396	ID0430	LVNVJAN2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
397	ID0432	COLLAUG2009	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Not Changed	NO
398	ID0434	AGF1518		ALTER	ALTER		Removed	Altered Fully	NO
399	ID0434	COLLJAN2005			ALTER			Altered Fully	Yes
400	ID0437	CHASENOV2007	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
401	ID0437	NATCREADJJUL2010	REMOVE	REMOVE		Not Changed	Removed		NO
402	ID0437	NORDSTROMMAR2008	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
403	ID0437	UNIVVILLAGE\$2350	REMOVE			Not Changed			Yes
404	ID0443	AMEX			REMOVE			Not Changed	Yes
405	ID0443	NAME			REMOVE			REMOVE	Yes
406	ID0443	SSN			ALTER			Not Changed	Yes
407	ID0445	COLLECTION\$370	ALTER	ALTER		Not Changed	Not Changed		Yes
408	ID0445	COLLECTION\$416	REMOVE	REMOVE		Removed	Removed		Yes
409	ID0445	COLLECTION\$809	REMOVE			Not Changed			Yes
410	ID0445	COLLECTION\$97	REMOVE	REMOVE		Not Changed	Not Changed		Yes
411	ID0445	MIDLAND	REMOVE	REMOVE		Not Changed	Not Changed		Yes
412	ID0445	PORTFOLIOOCT2005	REMOVE	REMOVE		Removed	Removed		Yes
413	ID0450	BESTBUY	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
414	ID0456	BIMRTG		REMOVE			Not Changed		Yes
415	ID0456	BOFA		REMOVE			Removed		Yes
416	ID0456	CHASE		REMOVE			Removed		Yes
417	ID0456	CHASEBB		REMOVE			Removed		Yes
418	ID0456	CITI		REMOVE			Removed		Yes
419	ID0456	CMMRTG		REMOVE			Removed		Yes
420	ID0456	CURADD		ALTER			Altered Fully		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
421	ID0456	DISC2003		REMOVE			Removed		Yes
422	ID0456	DISC2010		REMOVE			Removed		Yes
423	ID0456	EMPL		ALTER			Removed		Yes
424	ID0456	FBMRTG		REMOVE			Removed		Yes
425	ID0456	FRMNAME		REMOVE			Removed		Yes
426	ID0456	FUSA		REMOVE			Removed		Yes
427	ID0456	GEMB		REMOVE			Removed		Yes
428	ID0456	HPB&T		REMOVE			Removed		Yes
429	ID0456	HSBCBB		REMOVE			Removed		Yes
430	ID0456	HSBCE		REMOVE			Removed		Yes
431	ID0456	JCP		REMOVE			Removed		Yes
432	ID0456	RK		REMOVE			Removed		Yes
433	ID0456	SEARS		REMOVE			Removed		Yes
434	ID0456	SSN		ALTER			Altered Fully		Yes
435	ID0456	TARGET		REMOVE			Removed		Yes
436	ID0456	THD		REMOVE			Removed		Yes
437	ID0469	GRLHEL	ALTER			Not Changed			Yes
438	ID0472	THDJAN1997	ALTER	ALTER		Altered Fully	Altered Fully		Yes
439	ID0479	COLLATT2010		REMOVE			Not Changed		Yes
440	ID0479	COLLATT2011		REMOVE			Not Changed		Yes
441	ID0479	COLLSEP2009\$305	REMOVE			Not Changed			Yes
442	ID0479	COLLSPRINT	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
443	ID0479	LIFEB2006	REMOVE			Not Changed			Yes
444	ID0479	OCW	ALTER	ALTER		Not Changed	Not Changed		Yes
445	ID0481	BLOOMINGDALES	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
446	ID0481	CURADD	ALTER			Altered Fully			Yes
447	ID0481	PREVADD		REMOVE			Not Changed		Yes
448	ID0482	BACHOMELNSAPR2005	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
449	ID0482	BACHOMELNSJUN2004	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
450	ID0487	NCTX0001	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
451	ID0493	ASHLEROAKS\$219	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
452	ID0493	ATT\$162	ALTER		ALTER	Removed		Removed	Yes
453	ID0493	PREVADD	REMOVE	REMOVE		Removed	Not Changed		NO
454	ID0498	INQCONSUMERCE	REMOVE			Not Changed			Yes
455	ID0499	BLUECROSS	REMOVE			Not Changed			Yes
456	ID0502	BOFAOCT1996		ALTER			Removed		Yes
457	ID0502	HUNTINGTONAPR2004	ALTER			Removed			Yes
458	ID0502	VISAOCT1996		REMOVE			Removed		Yes
459	ID0503	CITIJUN2006	ALTER	ALTER	ALTER	Not Changed	Altered Fully	Altered Fully	NO
460	ID0515	MERVYNSFEB1988		ALTER			Altered Fully		Yes
461	ID0515	SHELLJULY2000	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
462	ID0516	CAPONEAUG2004\$29	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
463	ID0516	CAPONEAUG2004\$334	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
464	ID0516	CAPONECOLLECT\$107	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Removed	NO
465	ID0516	CAPONEJULY2006	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Not Changed	NO
466	ID0516	CAPONEMAR2003	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
467	ID0516	CREDITFEB2007	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Not Changed	NO
468	ID0516	CREDITONENOV2004	REMOVE	REMOVE		Removed	Removed		Yes
469	ID0516	DSRMMAR2006	REMOVE		REMOVE	Not Changed		Not Changed	Yes
470	ID0516	MIDLANDAUG2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
471	ID0518	CAPONEJUNE2008	ALTER	ALTER	ALTER	Unknown	Altered Fully	Unknown	NO
472	ID0518	CURRADD	REMOVE			Unknown			Yes
473	ID0518	MEDCOLL\$46		REMOVE			Not Changed		Yes
474	ID0518	WFFMARCH2005	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Unknown	NO
475	ID0520	TAXLIENOCT2002	REMOVE			Removed			Yes
476	ID0522	AA\$273	REMOVE	REMOVE	REMOVE	Altered Partly	Altered Partly	Not Changed	NO

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
477	ID0522	COLLECTIONAPR2005X2001	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
478	ID0522	DISHNETWORKX6290			REMOVE			Removed	Yes
479	ID0522	EMBARQX1194		REMOVE	REMOVE		Removed	Removed	Yes
480	ID0522	TAXLIEN\$13654		REMOVE	REMOVE		Not Changed	Removed	NO
481	ID0522	TAXLIENX0574			REMOVE			Removed	Yes
482	ID0522	TAXLIENX3091	REMOVE			Removed			Yes
483	ID0522	TAXLIENX4519			REMOVE			Removed	Yes
484	ID0522	TAXLIENX9212			REMOVE			Removed	Yes
485	ID0523	AURORAX1378	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
486	ID0523	BACHOMELOANSX9505	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
487	ID0523	WELLSFARGOJUNE2001	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
488	ID0526	COLLECTIONJAN2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
489	ID0526	FRMRNAME1			REMOVE			Removed	Yes
490	ID0526	FRMRNAME2			REMOVE			Removed	Yes
491	ID0526	FRMRNAME3	REMOVE			Removed			Yes
492	ID0526	FRMRNAME4		REMOVE			Not Changed		Yes
493	ID0526	PREVADD		ALTER	ALTER		Altered Fully	Altered Fully	Yes
494	ID0532	COMCASTAPR2011	REMOVE		REMOVE	Removed		Removed	Yes
495	ID0532	MEDCOLL254	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
496	ID0532	MEDCOLL597	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
497	ID0532	RELIANTENERGY	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
498	ID0536	ALLIEDX0601			REMOVE			Removed	Yes
499	ID0536	ALLIEDX0602			REMOVE			Removed	Yes
500	ID0536	ALLIEDX9202			REMOVE			Removed	Yes
501	ID0536	COXX297		ALTER			Removed		Yes
502	ID0536	CURRADDRESS	ALTER			Not Changed			Yes
503	ID0536	PRESTIGE OCT2001	ALTER	ALTER		Not Changed	Removed		NO
504	ID0536	SPRINT577	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
505	ID0536	SPRINT578	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes
506	ID0537	ADDRESSES			ALTER			Altered Fully	Yes
507	ID0537	EQUABLEOCT2009	REMOVE			Removed			Yes
508	ID0537	LEGALITEMJUN2009	REMOVE			Not Changed			Yes
509	ID0537	TRUENORTHOCT2008		REMOVE	REMOVE		Removed	Removed	Yes
510	ID0542	ARBORSDEC2008	REMOVE			Removed			Yes
511	ID0543	TDAUTODEC2005		ALTER	ALTER		Altered Fully	Altered Fully	Yes
512	ID0548	KARSAZJULY2006		REMOVE			Altered Partly		Yes
513	ID0548	KARSAZSEPT2008		REMOVE			Removed		Yes
514	ID0553	MACYSSEPT1975	ALTER		ALTER	Altered Fully		Altered Fully	Yes
515	ID0555	AKUSANOV2000	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
516	ID0555	GMACFEB2003		ALTER			Removed		Yes
517	ID0555	HSBCSEPT1999	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes
518	ID0555	LVNVACCT	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes
519	ID0557	BOFAMAY2008			ALTER			Not Changed	Yes
520	ID0557	EXPRESSMAY2007	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
521	ID0564	DISCOVERFEB2010			REMOVE			Removed	Yes
522	ID0564	MEDAUG2010	REMOVE	REMOVE		Not Changed	Not Changed		Yes
523	ID0570	CHASEDEC1998		ALTER			Not Changed		Yes
524	ID0570	CHSEAUG2005		ALTER			Not Changed		Yes
525	ID0570	NAME		REMOVE			Not Changed		Yes
526	ID0570	ZALES AUG2010INQ		REMOVE			Not Changed		Yes
527	ID0571	NAME			REMOVE			Not Changed	Yes
528	ID0571	UNIVERSALJULY2005	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Not Changed	NO
529	ID0573	LEWISTONMAY2005	ALTER		ALTER	Not Changed		Removed	NO
530	ID0584	COLLECTAUG2009	ALTER		REMOVE	Removed		Removed	Yes
531	ID0584	WFHMAUG2006	ALTER	ALTER		Not Changed	Not Changed		Yes
532	ID0585	AMEXMAY1996			ALTER			Removed	Yes



Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
533	ID0585	EMPL		REMOVE			Not Changed		Yes
534	ID0585	PREADD		REMOVE			Not Changed		Yes
535	ID0587	ATTX3223	REMOVE			Removed			Yes
536	ID0590	CHASE1994		ALTER			Removed		Yes
537	ID0590	EXXMBLCITI		ALTER			Altered Fully		Yes
538	ID0590	INQORCS	REMOVE			Removed			Yes
539	ID0592	COLL\$135	REMOVE		REMOVE	Not Changed		Not Changed	Yes
540	ID0592	COLL\$507		REMOVE	REMOVE		Removed	Removed	Yes
541	ID0592	COLL\$62	REMOVE		REMOVE	Not Changed		Removed	NO
542	ID0597	CHASEDEC2007	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
543	ID0599	LIEN\$1506		REMOVE			Not Changed		Yes
544	ID0599	LIEN\$9487			REMOVE			Removed	Yes
545	ID0599	LIEN\$9497			REMOVE			Removed	Yes
546	ID0599	LIEN\$9500			REMOVE			Removed	Yes
547	ID0599	LIEN\$967		REMOVE			Not Changed		Yes
548	ID0599	MRS1300		REMOVE			Not Changed		Yes
549	ID0605	BARCLAYSEPT2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
550	ID0605	BOFASEPT2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
551	ID0605	CHASEAUG2008	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
552	ID0605	CHASESEPT2006	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
553	ID0606	CHASEOCT2008		ALTER			Not Changed		Yes
554	ID0606	PRBANKRUPTCY		ALTER	ALTER		Removed	Removed	Yes
555	ID0606	PREADD		REMOVE	REMOVE		Removed	Removed	Yes
556	ID0614	COLLMAR2009	REMOVE		REMOVE	Not Changed		Not Changed	Yes
557	ID0614	COLLSEP2005	REMOVE		REMOVE	Removed		Removed	Yes
558	ID0614	CRDTONEDDEC2007	REMOVE		REMOVE	Not Changed		Not Changed	Yes
559	ID0614	LVNC\$582MAR2009			REMOVE			Not Changed	Yes
560	ID0614	LVNV\$438MAR2009			REMOVE			Not Changed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
561	ID0614	LVNVF\$438MAR2009	REMOVE			Not Changed			Yes
562	ID0614	LVNVF\$582MAR2009	REMOVE			Not Changed			Yes
563	ID0614	VERIZONAUG1974	REMOVE		REMOVE	Removed		Removed	Yes
564	ID0616	CITIOCT1996	ALTER	ALTER		Altered Partly	Altered Partly		Yes
565	ID0616	INQJAN32011		REMOVE			Not Changed		Yes
566	ID0623	BRAZOSSEPT2004			ALTER			Altered Fully	Yes
567	ID0623	CAPONEJAN2000			ALTER			Removed	Yes
568	ID0626	WFBJUNE1983	REMOVE			Removed			Yes
569	ID0627	CURRADD		ALTER			Not Changed		Yes
570	ID0627	SMAPR1992	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
571	ID0627	SMAPR1994	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
572	ID0627	SMMAY1993	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
573	ID0627	SMOCT1991	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
574	ID0627	SMSEP1992	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
575	ID0627	SMSEP1993	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
576	ID0628	BOFASEPT1995			ALTER			Not Changed	Yes
577	ID0628	PREVADD		REMOVE			Removed		Yes
578	ID0628	UNLV/CITIDEC1994		REMOVE			Removed		Yes
579	ID0633	FORMERNAME		REMOVE			Removed		Yes
580	ID0633	MULLENSEP2002	ALTER	ALTER	ALTER	Altered Fully	Not Changed	Removed	NO
581	ID0646	BOFAREVJUN1996	REMOVE		REMOVE	Removed		Removed	Yes
582	ID0646	CITIREVOCT1998	REMOVE		REMOVE	Removed		Removed	Yes
583	ID0647	MRTGX6300	ALTER	ALTER	ALTER	Altered Partly	Unknown	Removed	NO
584	ID0647	PREVADD	REMOVE	REMOVE	REMOVE	Removed	Unknown	Removed	NO
585	ID0647	TOYOTAMAY2006	ALTER	ALTER	ALTER	Altered Partly	Unknown	Removed	NO
586	ID0648	CHASE\$1	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
587	ID0649	ARROWOCT2008		ALTER	ALTER		Removed	Removed	Yes
588	ID0649	BAKERBBKJUNE2006	ALTER		ALTER	Unknown		Not Changed	NO

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
589	ID0649	COLLECT\$481	ALTER		ALTER	Unknown		Altered Fully	NO
590	ID0649	FORMERNAME	REMOVE			Unknown			Yes
591	ID0649	HSBCJULY2007	ALTER		ALTER	Unknown		Altered Fully	NO
592	ID0649	LEGALITEMMAY2004	ALTER			Unknown			Yes
593	ID0649	MIRAMEDRGJAN2009			ALTER			Removed	Yes
594	ID0649	PINJAN2009	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Not Changed	NO
595	ID0649	PREVADDA			REMOVE			Removed	Yes
596	ID0649	PREVADDB		REMOVE			Removed		Yes
597	ID0649	TAXLIENJULY1994	REMOVE			Unknown			Yes
598	ID0649	TOYOTASEP2002			ALTER			Removed	Yes
599	ID0649	VALLEYSEP2002	ALTER	ALTER		Unknown	Removed		NO
600	ID0649	VERIZON			REMOVE			Removed	Yes
601	ID0651	BONMARCHEMAR2006		ALTER	ALTER		Altered Partly	Not Changed	NO
602	ID0651	CRDTFIRSTMAY2004	REMOVE			Not Changed			Yes
603	ID0651	CURRADD	ALTER	ALTER		Altered Fully	Altered Fully		Yes
604	ID0657	COLLADVASSETSJUL2010		REMOVE	REMOVE		Removed	Removed	Yes
605	ID0657	EMPL	ALTER	REMOVE	ALTER	Altered Fully	Not Changed	Altered Fully	NO
606	ID0657	INQAC&FJAN2010			REMOVE			Removed	Yes
607	ID0657	INQHSBCFEB2010		REMOVE			Removed		Yes
608	ID0657	INQJPFJAN2010			REMOVE			Removed	Yes
609	ID0657	INQLERJUNE2010			REMOVE			Not Changed	Yes
610	ID0657	INQNCBFE2010			REMOVE			Removed	Yes
611	ID0657	PREVADD	REMOVE			Removed			Yes
612	ID0671	COLUMBIAX7704		REMOVE			Not Changed		Yes
613	ID0671	DEPTOFEDX0010	ALTER		ALTER	Removed		Not Changed	NO
614	ID0671	DISHAUG2010	REMOVE	REMOVE		Removed	Not Changed		NO
615	ID0671	FORMERNAME"R"	REMOVE		REMOVE	Removed		Removed	Yes
616	ID0671	INQCREDCOOCT2010		REMOVE			Not Changed		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
617	ID0671	NUVELLX6404	ALTER			Removed			Yes
618	ID0671	TAXLIENSEP2010	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
619	ID0671	VILLASAUG2004			REMOVE			Removed	Yes
620	ID0671	WELLSFARGOX7377		ALTER			Not Changed		Yes
621	ID0672	CHASEMAY2003	ALTER		ALTER	Not Changed		Not Changed	Yes
622	ID0672	SAABMAY2005	ALTER		ALTER	Altered Fully		Removed	NO
623	ID0674	NATIONWIDEAUG2009		REMOVE	REMOVE		Removed	Removed	Yes
624	ID0674	USDEPTOFEDX1282	ALTER		ALTER	Not Changed		Not Changed	Yes
625	ID0677	INQWFJUNE2010	REMOVE			Not Changed			Yes
626	ID0681	BLAIRCORPMAR2003	ALTER			Removed			Yes
627	ID0682	AMEXJUL1990			ALTER			Altered Fully	Yes
628	ID0682	MB1861			REMOVE			Removed	Yes
629	ID0682	MB1869			REMOVE			Removed	Yes
630	ID0682	VW0658	REMOVE		REMOVE	Not Changed		Not Changed	Yes
631	ID0684	HERITAGE	ALTER			Unknown			Yes
632	ID0684	REGACC	ALTER	ALTER	ALTER	Unknown	Unknown	Altered Fully	NO
633	ID0684	SANTANDER1000	ALTER	ALTER	ALTER	Unknown	Unknown	Not Changed	NO
634	ID0690	COLLECT\$1284	REMOVE		REMOVE	Unknown		Removed	NO
635	ID0690	COLLECT\$262	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Removed	NO
636	ID0690	COLLECT\$495	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Not Changed	NO
637	ID0690	COLLECT\$684	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Not Changed	NO
638	ID0690	COLLECT\$85	REMOVE	REMOVE	REMOVE	Unknown	Removed	Removed	NO
639	ID0690	HARVARD\$103			REMOVE			Removed	Yes
640	ID0690	SNTRSTX0201	ALTER		ALTER	Unknown		Not Changed	NO
641	ID0690	SUNTRSTX0202	ALTER		ALTER	Unknown		Not Changed	NO
642	ID0690	TENNSTUDN\$75,082	ALTER	ALTER		Unknown	Not Changed		NO
643	ID0690	TENNSTUDN\$82,848	ALTER	ALTER		Unknown	Not Changed		NO
644	ID0698	DEPTOFEDX0283A		ALTER			Altered Fully		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
645	ID0698	DEPTOFEDX0283B		REMOVE			Not Changed		Yes
646	ID0698	HIGHEDX2801			ALTER			Altered Fully	Yes
647	ID0699	PRJUNE2004	REMOVE			Altered Partly			Yes
648	ID0702	M4873		ALTER	ALTER		Altered Partly	Altered Partly	Yes
649	ID0702	M9313	ALTER	ALTER	ALTER	Not Changed	Not Changed	Removed	NO
650	ID0711	ALLIANCEONEMAY2010			REMOVE			Removed	Yes
651	ID0711	AMEXLPB19	REMOVE		REMOVE	Unknown		Removed	NO
652	ID0711	AMEXMAR2000	REMOVE		REMOVE	Unknown		Removed	NO
653	ID0711	AMEXSEP2000	REMOVE		REMOVE	Unknown		Removed	NO
654	ID0711	APPLIEDFEB1998			REMOVE			Not Changed	Yes
655	ID0711	APPLIEDSEP1998A			REMOVE			Removed	Yes
656	ID0711	APPLIEDSEP1998B			REMOVE			Removed	Yes
657	ID0711	BANKFIRSTJUNE1998			REMOVE			Removed	Yes
658	ID0711	CAPONEAUG1999	REMOVE		REMOVE	Unknown		Removed	NO
659	ID0711	CAPONEDEC2000	REMOVE		REMOVE	Unknown		Removed	NO
660	ID0711	CAPONEFEB2002	REMOVE		REMOVE	Unknown		Removed	NO
661	ID0711	CHASEAUG1999	REMOVE			Unknown			Yes
662	ID0711	CHASEOCT2002	REMOVE			Unknown			Yes
663	ID0711	GEMBSAMSAUG2002	REMOVE		REMOVE	Unknown		Removed	NO
664	ID0711	GEMBWALMJUL2000	REMOVE		REMOVE	Unknown		Removed	NO
665	ID0711	LVNV\$1066	REMOVE		REMOVE	Unknown		Removed	NO
666	ID0711	LVNV\$2632	REMOVE		REMOVE	Unknown		Removed	NO
667	ID0711	LVNV\$471	REMOVE		REMOVE	Unknown		Removed	NO
668	ID0711	MIDLANDFEB2006			REMOVE			Removed	Yes
669	ID0711	MIDLANDJUNE2007	REMOVE		REMOVE	Unknown		Removed	NO
670	ID0711	MIDLANDOCT2007	REMOVE		REMOVE	Unknown		Removed	NO
671	ID0711	NCOFIN\$1292	REMOVE		REMOVE	Unknown		Removed	NO
672	ID0711	NCOFIN\$2104	REMOVE		REMOVE	Unknown		Removed	NO

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
673	ID0711	PINNACLE\$7308	REMOVE		REMOVE	Unknown		Removed	NO
674	ID0711	PINNACLE\$8640	REMOVE		REMOVE	Unknown		Removed	NO
675	ID0711	PREVADD7217	REMOVE		REMOVE	Unknown		Not Changed	NO
676	ID0711	SHELLAUG2007	REMOVE		REMOVE	Unknown		Removed	NO
677	ID0711	SHELLNOV2000			REMOVE			Removed	Yes
678	ID0711	UNKNOWNFEB2006	REMOVE			Unknown			Yes
679	ID0713	MEDCOLLSEP2007	REMOVE			Not Changed			Yes
680	ID0713	PREVNAME			REMOVE			Removed	Yes
681	ID0719	EMPL		REMOVE			Removed		Yes
682	ID0719	INQTC/GCAPR2011			REMOVE			Not Changed	Yes
683	ID0719	INQURSJUL2010		REMOVE			Removed		Yes
684	ID0720	CHASEX2130	ALTER		ALTER	Altered Fully		Altered Fully	Yes
685	ID0720	CHASEX2130DUP			REMOVE			Removed	Yes
686	ID0720	GMACX6442	ALTER		ALTER	Not Changed		Not Changed	Yes
687	ID0720	GMACX6442DUP			REMOVE			Removed	Yes
688	ID0720	MEDCOLL\$20		ALTER			Not Changed		Yes
689	ID0720	MEDCOLL\$25		ALTER			Not Changed		Yes
690	ID0720	PREVADD5104	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
691	ID0720	PRTAXLIENMAR1996			ALTER			Removed	Yes
692	ID0721	CERTEGY	REMOVE			Removed			Yes
693	ID0721	CITI			REMOVE			Removed	Yes
694	ID0724	ALLY		ALTER			Altered Fully		Yes
695	ID0724	FLAMINGO	ALTER			Not Changed			Yes
696	ID0727	ACCESSJUNE1999		ALTER			Not Changed		Yes
697	ID0727	ATTFEB2004	ALTER		ALTER	Removed		Removed	Yes
698	ID0727	COMCASTJUL2008	REMOVE	REMOVE		Removed	Removed		Yes
699	ID0727	ERSOLUTIONSSEP2007		REMOVE			Removed		Yes
700	ID0727	LVNVJAN2007			REMOVE			Removed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
701	ID0727	LVNVSEP2006	REMOVE	REMOVE	REMOVE	Removed	Removed	Not Changed	NO
702	ID0727	NCOFINNOV2007		ALTER			Removed		Yes
703	ID0727	PREVADD			REMOVE			Removed	Yes
704	ID0727	RJMDEC2009		ALTER			Removed		Yes
705	ID0737	CAPONESEP2008	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Not Changed	NO
706	ID0737	PREVADD6533	REMOVE	REMOVE	REMOVE	Unknown	Removed	Removed	NO
707	ID0739	CHASEOCT1998	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
708	ID0740	DOE	ALTER			Not Changed			Yes
709	ID0740	TNDHS	ALTER	ALTER		Altered Fully	Altered Fully		Yes
710	ID0741	FNBOMAHA		ALTER	ALTER		Removed	Removed	Yes
711	ID0750	AMEXJUNE2000		ALTER			Not Changed		Yes
712	ID0750	AMEXMARCH2000		ALTER			Removed		Yes
713	ID0750	BBTFEB2004	ALTER	ALTER		Not Changed	Altered Fully		NO
714	ID0750	BOFAAUG2004		ALTER			Not Changed		Yes
715	ID0750	BOFAJUNE2000		ALTER			Not Changed		Yes
716	ID0750	BOFAMAY19999		ALTER			Not Changed		Yes
717	ID0750	COLLECTSEP2008	REMOVE			Removed			Yes
718	ID0750	COLLECTSEP2009	REMOVE		REMOVE	Not Changed		Removed	NO
719	ID0750	GRANITSEP2009			REMOVE			Removed	Yes
720	ID0750	HSBCAPRIL2007	ALTER		ALTER	Removed		Removed	Yes
721	ID0750	PREVADD627	REMOVE			Removed			Yes
722	ID0750	RESURGENTSEP2009	REMOVE			Removed			Yes
723	ID0750	TIMEWARNERDEC2008	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
724	ID0754	BOFAJAN4		REMOVE			Removed		Yes
725	ID0754	BOFAJAN5			REMOVE			Removed	Yes
726	ID0755	COLLAUG2005\$284		REMOVE	REMOVE		Not Changed	Removed	NO
727	ID0755	COLLBABCOCK		REMOVE	REMOVE		Removed	Removed	Yes
728	ID0755	COLLCOLHSE		REMOVE	REMOVE		Not Changed	Removed	NO

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
729	ID0755	COLLDEC2005\$415	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
730	ID0755	COLLFEB2010\$320	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
731	ID0755	COLLJUL2005\$55		REMOVE	REMOVE		Not Changed	Removed	NO
732	ID0755	COLLJUL2005\$65	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
733	ID0755	COLLJUL2007\$277		REMOVE	REMOVE		Not Changed	Removed	NO
734	ID0755	COLLOCT2006\$444	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
735	ID0755	COLLWESTBAYACQ	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Removed	NO
736	ID0755	INQ1STFEDJAN222010	REMOVE			Removed			Yes
737	ID0755	INQCAPONEOCT82010	REMOVE			Not Changed			Yes
738	ID0755	INQCHASESEP42010	REMOVE			Not Changed			Yes
739	ID0755	INQCHLDSEP42010	REMOVE			Not Changed			Yes
740	ID0755	INQCPSSSEP42010	REMOVE			Not Changed			Yes
741	ID0755	INQCRAPR122010			REMOVE			Removed	Yes
742	ID0755	INQCREDCONOV52010	REMOVE			Removed			Yes
743	ID0755	INQDSCHVSEP42010	REMOVE			Not Changed			Yes
744	ID0755	INQDSMAY192010			REMOVE			Removed	Yes
745	ID0755	INQDSMAY2010		REMOVE			Removed		Yes
746	ID0755	INQLSSENOV152010			REMOVE			Not Changed	Yes
747	ID0755	INQMCLVNBUICKNOCV122010	REMOVE			Not Changed			Yes
748	ID0755	INQNICHOLASNOV92010	REMOVE			Not Changed			Yes
749	ID0755	INQPROFFINNOV92010	REMOVE			Not Changed			Yes
750	ID0755	INQPROFFINSEP132010	REMOVE			Not Changed			Yes
751	ID0755	INQQUALITYLEANOV182010	REMOVE			Not Changed			Yes
752	ID0755	INQUIRYSANTANDEROCT82010	REMOVE			Not Changed			Yes
753	ID0755	INQVERIZON		REMOVE			Removed		Yes
754	ID0767	CITIDEC05	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
755	ID0767	CITIED04			ALTER			Altered Partly	Yes
756	ID0767	CITIED05			ALTER			Altered Partly	Yes



Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
757	ID0774	DISCOVERDEC2000	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes
758	ID0776	HSBC			ALTER			Removed	Yes
759	ID0782	FIRSTSEP2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
760	ID0788	SALUTEMAR2008	ALTER	ALTER		Removed	Removed		Yes
761	ID0788	TAXLIENX4099	REMOVE			Not Changed			Yes
762	ID0788	TAXLIENX4101	REMOVE			Not Changed			Yes
763	ID0788	TIMEWARNERAUG2007	REMOVE	REMOVE		Not Changed	Not Changed		Yes
764	ID0788	TINWARNEROCT2006	REMOVE			Not Changed			Yes
765	ID0788	TRIBUTEMAR2008	ALTER	ALTER		Removed	Removed		Yes
766	ID0791	DILLARDSAPR1988	REMOVE			Removed			Yes
767	ID0791	INQRESOURCEBK	REMOVE			Removed			Yes
768	ID0791	LOWESNOV2003	REMOVE			Removed			Yes
769	ID0797	AACJAN2009	REMOVE	REMOVE		Not Changed	Not Changed		Yes
770	ID0797	BMGJAN2010		ALTER	ALTER		Removed	Removed	Yes
771	ID0797	CAPONEJAN2009			REMOVE			Not Changed	Yes
772	ID0797	CURRADD			ALTER			Not Changed	Yes
773	ID0797	EMPL		REMOVE	REMOVE		Removed	Removed	Yes
774	ID0797	FBVINOV1999	REMOVE		REMOVE	Not Changed		Not Changed	Yes
775	ID0797	FRMNAME		REMOVE	REMOVE		Removed	Removed	Yes
776	ID0797	MCMNOV2008		REMOVE			Not Changed		Yes
777	ID0797	NATIONWIDESEPT2006		ALTER	REMOVE		Removed	Removed	Yes
778	ID0797	NEWPORTNEWS		ALTER			Removed		Yes
779	ID0797	PREADD	REMOVE	REMOVE	REMOVE	Removed	Removed	Not Changed	NO
780	ID0797	SSTMAR2004	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
781	ID0797	WALMAY2004	ALTER	ALTER	ALTER	Not Changed	Altered Fully	Altered Fully	NO
782	ID0797	WFNNBFB			ALTER			Altered Fully	Yes
783	ID0801	BOFAFEB2000			REMOVE			Not Changed	Yes
784	ID0801	FORMERNAME		REMOVE			Removed		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
785	ID0801	ZIONOCT2006	ALTER		ALTER	Altered Fully		Altered Fully	Yes
786	ID0806	COLLECTFEB2009		REMOVE	REMOVE		Not Changed	Removed	NO
787	ID0806	COLLECTFEB2010	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
788	ID0806	COLLECTMAR2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
789	ID0806	COLLECTNOV2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
790	ID0806	COLLECTOCT2009	REMOVE	REMOVE	REMOVE	Altered Partly	Altered Partly	Removed	NO
791	ID0806	COLLECTOCT2010	REMOVE	REMOVE		Removed	Altered Partly		NO
792	ID0806	COLLECTSEP2009182	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Removed	NO
793	ID0806	COLLECTSEP2009266			REMOVE			Removed	Yes
794	ID0806	COLLECTSEP2009267	REMOVE	REMOVE		Not Changed	Not Changed		Yes
795	ID0806	TRANSAMERICAMAY2001			REMOVE			Not Changed	Yes
796	ID0807	AMEXAPR1989			ALTER			Removed	Yes
797	ID0807	AMEXMAR1989			ALTER			Removed	Yes
798	ID0807	NAMEINITIAL	ALTER			Altered Fully			Yes
799	ID0807	PREVADD	ALTER	ALTER	ALTER	Altered Partly	Altered Partly	Removed	NO
800	ID0810	AFNIBL	REMOVE			Not Changed			Yes
801	ID0810	AT&T9084		REMOVE	REMOVE		Not Changed	Removed	NO
802	ID0810	CARFINSVCS	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
803	ID0810	COLL8833		ALTER	ALTER		Not Changed	Not Changed	Yes
804	ID0810	COLL8834		ALTER	ALTER		Not Changed	Not Changed	Yes
805	ID0810	COLL8997		ALTER	ALTER		Not Changed	Not Changed	Yes
806	ID0810	COLLAUG2006\$271	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
807	ID0810	COLLSEP2008\$3598	REMOVE		REMOVE	Removed		Removed	Yes
808	ID0810	COLLVERIZON		REMOVE	REMOVE		Not Changed	Not Changed	Yes
809	ID0810	INQMAB		REMOVE	REMOVE		Not Changed	Removed	NO
810	ID0810	UNKTLSEP2007\$233	REMOVE			Not Changed			Yes
811	ID0811	COLLMPD\$119APR2004		ALTER			Removed		Yes
812	ID0811	COLLMPD\$720APR2004		ALTER			Removed		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
813	ID0811	INQTMCC	REMOVE			Removed			Yes
814	ID0819	NEXTCARD			ALTER			Not Changed	Yes
815	ID0821	HSBCAUG2006			ALTER			Altered Fully	Yes
816	ID0828	CHASEMAR2006			REMOVE			Removed	Yes
817	ID0828	CITISEP2000A	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
818	ID0828	CITISEP2000B	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
819	ID0828	FORMERNAME			REMOVE			Removed	Yes
820	ID0828	WFBJAN1997	REMOVE			Not Changed			Yes
821	ID0830	COLLSPRINTSEP2009	REMOVE		REMOVE	Not Changed		Not Changed	Yes
822	ID0830	DREXELU	ALTER			Not Changed			Yes
823	ID0830	NISSINFI	ALTER			Altered Fully			Yes
824	ID0835	FRMNAME		REMOVE			Not Changed		Yes
825	ID0835	TAXLIENMAR1992	REMOVE			Removed			Yes
826	ID0839	INQVRSFEB092010			REMOVE			Removed	Yes
827	ID0839	INQVRSFEB232010			REMOVE			Removed	Yes
828	ID0839	INQVRSMAR152010			REMOVE			Removed	Yes
829	ID0840	DEPTOFEDDEC2008	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
830	ID0843	WCC\$17730APR2005		ALTER			Altered Fully		Yes
831	ID0843	WCC\$69833APR2005		ALTER			Altered Fully		Yes
832	ID0856	TFCAPR2007			REMOVE			Removed	Yes
833	ID0857	HONDAJUL2006	ALTER	ALTER	ALTER	Altered Partly	Altered Partly	Altered Partly	Yes
834	ID0857	HONDAJUL2006B		REMOVE			Altered Partly		Yes
835	ID0863	UI		ALTER			Removed		Yes
836	ID0864	AFNIBLOOMJAN2010	REMOVE	REMOVE	REMOVE	Not Changed	Altered Partly	Not Changed	NO
837	ID0864	COLLECTAUG2004		ALTER			Removed		Yes
838	ID0864	COLLECTJUL2006	REMOVE			Not Changed			Yes
839	ID0864	COLLECTNOV2004		REMOVE			Removed		Yes
840	ID0864	COLLECTOCT2008	ALTER	ALTER		Not Changed	Not Changed		Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
841	ID0864	DEPTOFEDMAR2009		ALTER	ALTER		Not Changed	Not Changed	Yes
842	ID0864	DEPTOFEDMAR2009B		REMOVE			Not Changed		Yes
843	ID0864	DFSMARCH2010		ALTER	ALTER		Not Changed	Not Changed	Yes
844	ID0864	IMAGINEAPR2007	ALTER			Altered Fully			Yes
845	ID0864	PREVADD	REMOVE			Removed			Yes
846	ID0866	FSBBANKCARDAPR1999		REMOVE			Removed		Yes
847	ID0866	MIDOREGONAUG1998		REMOVE			Not Changed		Yes
848	ID0866	MIDOREGONFEB2003		REMOVE			Removed		Yes
849	ID0868	CITISEP2003		ALTER	ALTER		Altered Fully	Altered Fully	Yes
850	ID0869	CAPONEAPR2007	ALTER	ALTER	ALTER	Unknown	Not Changed	Not Changed	NO
851	ID0869	CHASEOCT2005	ALTER	ALTER		Unknown	Not Changed		NO
852	ID0869	CHRYSLER	ALTER	ALTER		Unknown	Not Changed		NO
853	ID0869	COLLAUG2005\$85	REMOVE	REMOVE		Unknown	Removed		NO
854	ID0869	COLLCH		REMOVE	REMOVE		Not Changed	Removed	NO
855	ID0869	COLLDEC2005\$265	REMOVE	REMOVE	REMOVE	Unknown	Not Changed	Removed	NO
856	ID0869	COLLKYUTILITY	REMOVE			Unknown			Yes
857	ID0869	COLLOCT2004\$175	REMOVE	REMOVE		Unknown	Removed		NO
858	ID0869	COLLRPA	REMOVE		REMOVE	Unknown		Not Changed	NO
859	ID0869	CORTRUST	ALTER	ALTER		Unknown	Not Changed		NO
860	ID0869	CURADD			ALTER			Not Changed	Yes
861	ID0869	CURADDPREADD	ALTER	ALTER		Unknown	Not Changed		NO
862	ID0869	FPBFEB2007		ALTER			Not Changed		Yes
863	ID0869	FPBNOV2004		ALTER			Not Changed		Yes
864	ID0869	HSBCJAN20071	ALTER			Unknown			Yes
865	ID0869	HSBCJAN20072	ALTER			Unknown			Yes
866	ID0869	JEFFERSNCPJAN2009	ALTER	REMOVE		Unknown	Not Changed		NO
867	ID0869	NELNETOCT2001	ALTER	ALTER		Unknown	Not Changed		NO
868	ID0869	PLAINSCOMM	REMOVE	ALTER	REMOVE	Unknown	Not Changed	Not Changed	NO

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
869	ID0869	PORTFOLIODEC2008	ALTER			Unknown			Yes
870	ID0869	PORTFOLIOJAN2009	ALTER			Unknown			Yes
871	ID0869	SM0080JUL2008	REMOVE			Unknown			Yes
872	ID0869	SM0090APR2009	REMOVE			Unknown			Yes
873	ID0869	SM0090APR2009B	REMOVE			Unknown			Yes
874	ID0869	SM0090FEB2009	REMOVE			Unknown			Yes
875	ID0869	SM0227FEB2009		REMOVE			Not Changed		Yes
876	ID0869	SM0407APR2009		REMOVE			Not Changed		Yes
877	ID0869	SM0407APR2009B		REMOVE			Not Changed		Yes
878	ID0869	SM0707JUL2008		REMOVE			Not Changed		Yes
879	ID0869	UOFPSEP2007	ALTER	ALTER		Unknown	Not Changed		NO
880	ID0870	TARGETOCT2004	REMOVE	REMOVE		Not Changed	Not Changed		Yes
881	ID0872	COLLECTION106	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes
882	ID0872	COLLECTION144	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes
883	ID0872	COLLECTION159	ALTER		ALTER	Not Changed		Not Changed	Yes
884	ID0872	COLLECTION67		ALTER	ALTER		Not Changed	Removed	NO
885	ID0874	CURRADD	REMOVE			Removed			Yes
886	ID0874	FIRSTINTERSTATEAUG2004			REMOVE			Removed	Yes
887	ID0874	TARGETJUL2001		ALTER			Removed		Yes
888	ID0874	THDMAY2003	ALTER	ALTER		Removed	Removed		Yes
889	ID0874	ZALESMAY2000		ALTER			Removed		Yes
890	ID0875	BOFAMRTG9512	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
891	ID0877	CHASE2936	ALTER		ALTER	Removed		Removed	Yes
892	ID0877	COLLMRASEP2006	REMOVE		REMOVE	Not Changed		Not Changed	Yes
893	ID0877	GMAC5744	ALTER	ALTER	ALTER	Removed	Altered Fully	Altered Fully	NO
894	ID0877	INQFDCS/CSI		REMOVE			Not Changed		Yes
895	ID0878	SEARSJUL2005	ALTER		ALTER	Removed		Altered Fully	NO
896	ID0879	CAPITALONEMAR2010			REMOVE			Removed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
897	ID0883	COLLMAR2009	REMOVE			Altered Partly			Yes
898	ID0885	STBK MAY2006	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
899	ID0886	COLLOCT2007	REMOVE			Not Changed			Yes
900	ID0901	CURRADD			ALTER			Not Changed	Yes
901	ID0901	FSTTENMAY2003			REMOVE			Not Changed	Yes
902	ID0903	CLCJUNE2007	ALTER			Not Changed			Yes
903	ID0903	ICMOCT2007		REMOVE			Removed		Yes
904	ID0910	FORMERNAME			REMOVE			Removed	Yes
905	ID0910	WINCOMAY2010	REMOVE			Not Changed			Yes
906	ID0911	COLLCOX2134	ALTER	ALTER		Removed	Removed		Yes
907	ID0911	COLLMAR2011\$58	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
908	ID0911	COLLMAR2011\$731	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
909	ID0911	COLLNOV2010\$1819		REMOVE			Removed		Yes
910	ID0911	DFASJUN2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
911	ID0911	INQDCSJUL2010		REMOVE			Removed		Yes
912	ID0923	COLLJUN2006\$180	ALTER			Not Changed			Yes
913	ID0923	INQAM/LANDS			REMOVE			Not Changed	Yes
914	ID0924	HSBCNOV1995			REMOVE			Removed	Yes
915	ID0926	ARROWSER	REMOVE			Removed			Yes
916	ID0926	COLLECTAUG2007		REMOVE			Not Changed		Yes
917	ID0926	COLLECTDEC2008		REMOVE			Not Changed		Yes
918	ID0926	COLLECTMAY2007		REMOVE			Not Changed		Yes
919	ID0926	FIRSTPREMIERE			REMOVE			Not Changed	Yes
920	ID0926	HSBCAUG2005A			REMOVE			Not Changed	Yes
921	ID0926	HSBCAUG2005B			REMOVE			Not Changed	Yes
922	ID0926	HSBCBANKAUG2005284			REMOVE			Not Changed	Yes
923	ID0926	HSBCBANKAUG2005422			REMOVE			Not Changed	Yes
924	ID0926	HSBCBANKJUL2007			REMOVE			Not Changed	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
925	ID0926	HSBCBANKSEP2004			REMOVE			Not Changed	Yes
926	ID0926	HSBCJUL2007			REMOVE			Not Changed	Yes
927	ID0926	HSBCNOV2004			REMOVE			Not Changed	Yes
928	ID0926	PORTFOLIO	REMOVE			Not Changed			Yes
929	ID0926	SEVENTHAVEFEB2010			REMOVE			Not Changed	Yes
930	ID0926	SHARPERIMAGEMAY2006	REMOVE			Not Changed			Yes
931	ID0926	SHELLOCT2004	ALTER		ALTER	Not Changed		Not Changed	Yes
932	ID0927	COMMUNBKJUN302010	REMOVE			Removed			Yes
933	ID0927	VSBMRTG6500			ALTER			Altered Fully	Yes
934	ID0936	COMCASTJUNE2005		REMOVE			Removed		Yes
935	ID0937	FORMERNAME	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
936	ID0937	GEMONEYBANKAPR2010			REMOVE			Not Changed	Yes
937	ID0937	GEMONEYBANKAUG2009			REMOVE			Not Changed	Yes
938	ID0937	GEMONEYBANKAUG2010		REMOVE			Not Changed		Yes
939	ID0937	GEMONEYBANKJUL2009\			REMOVE			Not Changed	Yes
940	ID0937	GEMONEYBANKJUL2010	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
941	ID0937	VERIZONJULY2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
942	ID0943	COLLECTIONFEB2007			REMOVE			Removed	Yes
943	ID0943	COLLECTIONMAY2006			REMOVE			Removed	Yes
944	ID0943	COLLECTIONOCT2006			REMOVE			Removed	Yes
945	ID0943	DISHAPR2007	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
946	ID0943	PINNACLEOCT2007		REMOVE			Removed		Yes
947	ID0943	PROGRESSIVEJAN2006			ALTER			Not Changed	Yes
948	ID0944	ALLIANCEONEJUNE2008		REMOVE	REMOVE		Removed	Removed	Yes
949	ID0944	FORMERNAME	REMOVE			Removed			Yes
950	ID0944	HOMEDEPOT	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
951	ID0945	EDFINANCIALX0001			ALTER			Altered Fully	Yes
952	ID0945	EDFINANCIALX0002			ALTER			Altered Fully	Yes

Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
953	ID0945	EDFINANCIALX0005			ALTER			Altered Fully	Yes
954	ID0945	EDFINANCIALX0006			ALTER			Altered Fully	Yes
955	ID0945	GUTTERGUARDMAY2008			REMOVE			Not Changed	Yes
956	ID0946	CHASE			REMOVE			Not Changed	Yes
957	ID0946	CHASEJUL2006	REMOVE			Not Changed			Yes
958	ID0946	CURRENTADD		REMOVE			Not Changed		Yes
959	ID0946	HOMEDEPOTJUL2006			REMOVE			Not Changed	Yes
960	ID0946	PINNACLEJUL2010		REMOVE	REMOVE		Not Changed	Not Changed	Yes
961	ID0946	SEARS			REMOVE			Not Changed	Yes
962	ID0946	SEARSDEC2003	REMOVE			Not Changed			Yes
963	ID0949	AFNI	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
964	ID0949	COMCASTJUL2008		REMOVE	REMOVE		Removed	Removed	Yes
965	ID0949	GMACJUL1999		ALTER			Altered Fully		Yes
966	ID0949	MED1JAN2008		REMOVE	REMOVE		Not Changed	Not Changed	Yes
967	ID0949	PREVADD			REMOVE			Removed	Yes
968	ID0952	CHASEMRTG	ALTER		ALTER	Not Changed		Not Changed	Yes
969	ID0955	MACYSAPR2010	ALTER	ALTER	ALTER	Not Changed	Not Changed	Not Changed	Yes
970	ID0955	USDOEF003		ALTER			Altered Fully		Yes
971	ID0957	BACHOMEJUN2004	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
972	ID0957	BESTBUYDEC2002	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
973	ID0957	BESTBUYDEC2002B		REMOVE			Removed		Yes
974	ID0966	DRESSBARNOCT2006	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
975	ID0968	COLLCHEJUN2008		REMOVE			Not Changed		Yes
976	ID0974	COLLMSCAUG2009		REMOVE			Removed		Yes
977	ID0976	FORMERNAME		REMOVE	REMOVE		Removed	Removed	Yes
978	ID0976	HSBCNOV200111899			ALTER			Altered Fully	Yes
979	ID0976	HSBCNOV2001902			ALTER			Altered Fully	Yes
980	ID0976	INQJUN2010	REMOVE			Removed			Yes



Table 59 - Summary of Bureau Outcomes for Each Item Disputed

Obs	Masked ID	Masked Item ID	Request Bureau A	Request Bureau B	Request Bureau C	Outcome Bureau A	Outcome Bureau B	Outcome Bureau C	All Actions Same
981	ID0976	LACKSVALLEYAUG2008		ALTER			Not Changed		Yes
982	ID0976	NAME	REMOVE			Removed			Yes
983	ID0976	PREVADD	REMOVE			Removed			Yes
984	ID0977	WELLSFARGOJUN2008		ALTER			Removed		Yes
985	ID0983	TIMEWARNERX8633	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
986	ID0983	TIMEWARNERX8914	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
987	ID0984	FORMERNAMES	REMOVE	ALTER	ALTER	Removed	Altered Partly	Altered Partly	NO
988	ID0984	INQAPR12			REMOVE			Removed	Yes
989	ID0984	INQAPR9		REMOVE			Removed		Yes
990	ID0984	INQAUG17		REMOVE			Not Changed		Yes
991	ID0984	INQAUG2			REMOVE			Not Changed	Yes
992	ID0984	INQFEB1		REMOVE			Not Changed		Yes
993	ID0984	INQFEB2			REMOVE			Not Changed	Yes
994	ID0984	INQJAN7		REMOVE			Not Changed		Yes
995	ID0984	INQJUL26			REMOVE			Not Changed	Yes
996	ID0984	INQJUL29	REMOVE			Removed			Yes
997	ID0984	INQMAR12			REMOVE			Removed	Yes
998	ID0984	INQMAR16			REMOVE			Removed	Yes
999	ID0984	INQMAR17			REMOVE			Removed	Yes
1000	ID0984	INQMAR22			REMOVE			Removed	Yes
1001	ID0984	INQMAY18			REMOVE			Removed	Yes
1002	ID0984	INQMAY28			REMOVE			Removed	Yes
1003	ID0984	INQSEP24			REMOVE			Not Changed	Yes
1004	ID0984	INQSEP7			REMOVE			Not Changed	Yes
1005	ID0984	INQSEP8		REMOVE			Not Changed		Yes
1006	ID0984	NAME		ALTER	ALTER		Not Changed	Not Changed	Yes
1007	ID0987	COLLECTOCT2010	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
1008	ID0987	COMCASTJUN2011	REMOVE		REMOVE	Not Changed		Not Changed	Yes

**Table 59 - Summary of Bureau Outcomes for Each Item Disputed**

<b>Obs</b>	<b>Masked ID</b>	<b>Masked Item ID</b>	<b>Request Bureau A</b>	<b>Request Bureau B</b>	<b>Request Bureau C</b>	<b>Outcome Bureau A</b>	<b>Outcome Bureau B</b>	<b>Outcome Bureau C</b>	<b>All Actions Same</b>
1009	ID0987	COMCASTMAY2010	REMOVE	REMOVE		Removed	Removed		Yes
1010	ID0993	COLLAT&T	ALTER			Removed			Yes
1011	ID0994	BOFAMAR2004	ALTER			Removed			Yes
1012	ID0994	CITISEP1994	ALTER		ALTER	Removed		Removed	Yes
1013	ID0995	KOHLAUG2005		ALTER			Not Changed		Yes
1014	ID0995	WFM0844		ALTER	ALTER		Altered Fully	Altered Fully	Yes
1015	ID0998	COLECTSEP2009	REMOVE	REMOVE	REMOVE	Not Changed	Not Changed	Not Changed	Yes
1016	ID0998	COLLECTDEC2007	REMOVE	REMOVE	REMOVE	Removed	Removed	Removed	Yes
1017	ID0998	COLLECTMAY2007	REMOVE	REMOVE	REMOVE	Removed	Not Changed	Not Changed	NO
1018	ID0998	NEXTCARDMAY2001			REMOVE			Removed	Yes
1019	ID0998	PENNCREDITJUL2010		REMOVE			Not Changed		Yes
1020	ID0999	HFCSEP2006	ALTER	ALTER	ALTER	Altered Fully	Altered Fully	Altered Fully	Yes
1021	ID0999	WILSHIREMAR2006	ALTER	ALTER	ALTER	Removed	Removed	Removed	Yes