



Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

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Your letter also asserts that the orders are deficient because they do not require respondents to provide “actual notice or other remedies to consumers.” After examining the evidence obtained during the investigations, the Commission determined that direct notification to consumers is not justified in these cases. The violations alleged in the complaint relate to respondents’ failure to provide required notices to the users of their reports - the insurance companies - and not to consumers. These notices are designed to alert the users of their FCRA obligations, most notably that they send notices to consumers when they take adverse action based in whole or in part on information contained in a consumer report. The Commission has obtained no evidence that the insurance companies using these reports failed to send adverse action notices when required.

Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Orders in final form without modification. Thank you again for your comments. The Commission is aided in its analysis by hearing from a variety of sources in its work, and it appreciates your interest in these matters.

By direction of the Commission.

Donald S. Clark
Secretary