



November 25, 2013

Chairman Tim P. Johnson
136 Hart Senate Office Building
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

We are writing to you today on behalf of Equifax Inc. and the National Consumer Telecom & Utilities Exchange ("NCTUE" or "Exchange") in regards to the *Credit Access and Inclusion Act* (SB 1613), which was recently introduced by Senators Mark Kirk (R-IL) and Joe Manchin (D-WV). As you consider SB 1613, we would like to make you aware of a service offered by NCTUE that already exists in today's marketplace that provides an opportunity to expand credit access to millions of consumers who in the past have had limited, if any, access to traditional credit as a result of their lack of credit history.

NCTUE is a nationwide, member-owned and operated, FCRA-compliant data exchange that houses both positive and negative alternative payment data (i.e., non-traditional financial payment reporting data, such as telecom and utility payments) on consumers, which is then available to NCTUE's members on a blind basis to aid in their credit decisioning and risk management. This service allows consumers to establish and build a credit profile based on their payment history for the use of NCTUE members. Membership in NCTUE is open to a wide range of companies, including the nation's leading pay television, utility and telecom services providers. These member companies currently report and share industry-specific payment data on more than 180 million consumers throughout the United States, providing the opportunity for these companies to offer relevant services to underbanked or unbanked consumers, outside of the traditional credit reporting system.

The Exchange benefits underbanked and unbanked consumers through the use of non-traditional payment information that can provide a basis for evaluating risks of individuals who were previously unscorable using traditional credit data alone. Twenty-five million consumers not found in traditional credit files are included in the NCTUE database. If a consumer has little or no traditional credit history, but has responsibly paid his or her phone or utility bills, that payment history may have a positive effect when applying for new services or credit with other providers or lenders who are members of NCTUE.

Other credit grantors may use scores that combine the NCTUE data with traditional credit scores or utilize their own custom risk scores. Through these blended scores, NCTUE provides the opportunity for non-utility and telecom credit grantors with their own proprietary scores that serve account acquisition underwriting needs in retail banking, auto and insurance. If a credit grantor utilizes alternative data sources like NCTUE when a traditional file has insufficient information, the NCTUE data may allow that credit grantor to offer a consumer better terms and credit, leveling the playing field in the credit market, for consumers who apply for credit from those credit grantors with access to NCTUE data.

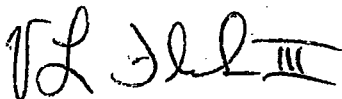
Currently, some state regulators and public utility commissions restrict sharing of certain utility account information. By providing information into an industry-specific exchange and participating in the governance of its use consistent with the FCRA, NCTUE members maintain ownership and control over such data and its use by others.

Reporting data to multiple credit bureaus and managing disputes from several sources may be expensive and time-consuming. It could also give rise to the potential for errors, thus harming consumers. Choosing to contribute data to a credit reporting agency like NCTUE can also limit dispute volume and result in consistent and manageable reporting.

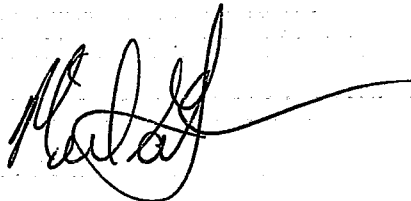
While we do not object to the intentions of SB 1613 - helping consumers build their credit profile using alternative payment data - we believe there is already a solution in the marketplace to address most, if not all, of the needs of these consumers. That is NCTUE. Using both positive and negative data from the NCTUE database allows credit grantors who have access to NCTUE data as described above to better serve the credit needs of all consumers, especially those who have little or no traditional credit history. NCTUE has a proven track record. In the end, the decision as to where and how to report credit information should be left to the businesses that must rely on it in ways that vary from industry to industry. A one-size fits all solution may lead to adverse, unintended consequences.

For questions or to request additional information, please contact Nick Stowell, Equifax Government Relations, at (404) 885-8742 or Alan Moore, NCTUE – Executive Director, at (972) 518-0019.

Sincerely,



Buddy Flake
NCTUE – Board President



Michael Gardner
Senior Vice President – Equifax