



Consumer Federation of America



Privacy Rights  
CLEARINGHOUSE

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September 20, 2007

Harry C. Gambill  
Chief Executive Officer  
Trans Union  
555 W. Adams St.  
Chicago, IL 60661-3614

Re: Provide an Easy to Use, Low Cost Security Freeze for All U.S. Consumers

Dear Mr. Gambill,

We appreciate TransUnion's recent announcement that starting October 15, 2007, it will make the security freeze available to U.S. consumers nationwide, including those consumers who reside in states which do not yet provide the right to place a security freeze by statute. This is an important step forward which will benefit many U.S. consumers who are concerned about protecting themselves from the new account form of identity theft.

As you know, the security freeze gives consumers a powerful tool to protect themselves from one form of identity theft by stopping the opening of new accounts for which a credit check is required, unless the consumer has lifted the security freeze using a PIN. For a security freeze to be effective to stop new account identity theft, it must be in place at each of the major consumer reporting agencies. The consumer has no control over which consumer reporting agency is used by the creditor or other entity who has been approached by a thief, making it essential that the consumer be able to maintain a freeze at all of the major consumer reporting agencies. For this reason, we are calling on the other major consumer reporting agencies to meet or exceed your commitment.

Elements of your announcement that we find of particular use and importance for consumers are that it applies to all consumers; that there will be no fees to place, temporarily lift or remove the freeze for identity theft victims; and that consumers will be able to lift the freeze by phone, a service you were already providing to consumers in freeze states.

We ask you to improve upon your announcement by adding these features to your program for all consumers. The features are drawn from the strongest state security freeze laws:

- Reducing the fee to no more than the lesser of the state cap or \$5 to place or lift for non-victims, with no fee to remove;
- Providing additional consumer choices for placement by phone and a secure electronic method plus lifting by the same means; and

- Providing for a 15-minute temporary lift when requested by a secure electronic method.

We also suggest that this consumer choice be easily accessible and prominently displayed on your website and customer service phone line, so that consumers may become well-educated about their choice to place a freeze.

Ten state laws restrict fees to place, lift, or both at a fee significantly lower than \$10. In light of the fact that a significant number of U.S. consumers already, or soon will, enjoy fees at or below \$5, we believe that the freeze should be made available to consumers nationwide at a fee that does not exceed the lesser of the state cap or \$5 to place and lift, with no fee to remove.<sup>1</sup>

Since you already are required by law to accept placement requests by phone for consumers in Minnesota and North Dakota, it should not be overly burdensome to do so for other consumers.

Finally, the security freeze will be most convenient for both consumers and businesses when it can be lifted promptly after the consumer supplies the proper PIN. You are already required by law to provide a secure electronic method with a 15 minute lift to consumers in Tennessee, Utah, the District of Columbia, Washington and Wyoming by September 1, 2008, and to consumers in Delaware, Maryland, Montana and Nebraska starting January 31, 2009. We ask that you provide the electronic 15 minute lift option to all U.S. consumers as quickly as you have the technological capacity to do so.

Your decision and announcement is a significant step toward the goal of each major consumer reporting agency offering a security freeze to each consumer nationwide which is fast, affordable, and easy for consumers to place and use. We thank you for taking this step, and we ask you to make your program more consumer-friendly by reducing the maximum fee to no more than \$5 to place and lift, eliminating the fee to remove; providing phone placement now and electronic placement and lifting as soon as possible, and moving as quickly as possible toward a timeframe of no more than 15 minutes to lift for all consumers with the freeze.

Very truly yours,

Gail Hillebrand  
Financial Services Campaign Manager  
Consumers Union of U. S., Inc.

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<sup>1</sup> For example, Indiana consumers enjoy the freeze without fees to place, lift or remove, and Montana caps the fee at \$3 for placement and lifting with no fee to remove. Minnesota, Massachusetts, Maryland and West Virginia restrict the fee to \$5 to place, lift and remove the freeze, while North Dakota's law permits a \$5 fee to place or lift and no fee to remove. New York and New Jersey laws restrict lift fees to \$5, with no fee to place. Tennessee has a \$7.50 placement fee, a \$5 removal fee and no fee for temporary lifting. Other states make the freeze free of fees for seniors over 65, (Oklahoma, Illinois and Rhode Island), or 62 (Louisiana).

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cc: Mr. Mark Marinko  
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