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A Non Profit Educational Corporation Assisting Victims and Educating the Public

Sunday, January 13, 2008

Response to FTC request for public comment on "Credit Report Freezes - Comment, Project No. P075420"

Topics for Comment, General:

1. Preventing Identity Theft; If no one has access to your credit, no one can use it. More Effective Alternatives to freezes; Stopping Identity Theft at the front end with effective use of Bio. Metrics and complete background checks both credit and criminal as well as E-verify.
2. What types of Identity Theft fraud are credit freezes effective in preventing; Any identity fraud that the business and banking community allows by not stopping identity theft at the front end.
3. How do credit freezes compare to current Federal laws; Fraud alerts expire and require the consumer to keep track all the time, credit freezes do not expire and stop the use and access to credit reports.
4. Credit freezes with all three compared to credit freezes similar to fraud alerts. Credit freezes should be incorporated into the annual free credit reports by providing the consumer the ability to check off all three credit reports for credit freezes and should be free.
5. Same as question # 4.
6. Credit freezes limitations; Credit freezes should be free to all consumers, including to the parents of children who have a social security number to prevent the child's identity from being stolen from places like hospitals and schools who traditionally have no security measures in place to prevent identity theft of the parents or child's personal information.
7. Temporarily removing credit freezes; There should not be much costs connected to a key stroke of ones credit report. But removing the credit freeze temporarily means buying power to the consumer and money from the business and banking communities. Providing easy temp. removal through the

- internet, over the phone or through the mail should be priority one for the consumer.
8. Same as question # 4.
  9. Appropriate time period to remove (Temp. or permanently) credit freeze; 24 hours should do it for anyone.
  10. Aspects of credit freeze mechanisms that encourage or hinder their use. Convenient use by the consumer is required, not abuse through inappropriate actions.
  11. CRA-developed freeze options compare or differ in practice from credit freezes mandated by state laws; CRA's control the consumer and their credit reports, state law gives the consumer control through criminal and punitive actions.
  12. How do credit freezes impact credit scoring or data modeling; A credit freeze should do just that, freeze everything related to the consumers credit until the consumer decides to remove that freeze.
  13. What other beneficial or burdensome effects do credit freezes have on the consumer, business, or the economy in general; Benefit to the consumer is no worry about their credit reports or the resulting identity theft as well as sale of personal information. The business community will not have unregulated access to consumer reports and their sale. And the economy will not suffer do to consumer actions.

Consumers must have free and complete control over their credit reports. Who and when they will be used.

The credit freeze issue should be taken a step further. If all three credit bureaus are three independent for profit companies competing against each other for customers and customer service, then the consumer should be allowed to freeze all three credit reports and un-freeze the one they wish to be used at any given time.

Sincerely,

Bob and JoAnn Hartle