



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

Office of the Secretary

August 13, 2014

Mr. Elton Crawford
State of Michigan

Re: *In the Matter of Credit Karma, Inc., File No. 132 3091, Docket No. C-4490*

Dear Mr. Crawford:

Thank you for your comment regarding the Federal Trade Commission's proposed consent agreement in the above-entitled proceeding. Your comment indicates that your credit report does not adequately reflect your creditworthiness because, among other things, you purchase items with cash and keep payments current rather than incurring interest. You suggest that the consumer reporting companies should consider such facts when evaluating credit history.

The Commission shares your concerns about so-called "thin files" -- consumer files with limited or no credit histories -- that limit the ability of credit providers to assess those consumers' creditworthiness. We urge you to review the publications we have developed for consumers on issues related to their credit reports, including one that we recently updated called "Building a Better Credit Report," <http://www.consumer.ftc.gov/articles/pdf-0032-building-a-better-credit-report.pdf>, which includes tips for improving your credit history. We also encourage you to request your free credit report from <http://www.annualcreditreport.com> at least once a year. For more information on how to do so, please see <http://www.consumer.ftc.gov/articles/0155-free-credit-reports>.

Although the proposed order with Credit Karma, Inc. is designed to address the data security concerns detailed in the Commission's complaint, the Commission is also committed to protecting consumers in financial distress. The Commission has numerous resources for financially-distressed consumers that can be found on our website at <http://consumer.ftc.gov>. Also, we have entered your complaint in our Consumer Sentinel complaint system. For future reference, you may contact the FTC's Consumer Response Center at (877) 282-4357, or file a complaint online at www.ftccomplaintassistant.gov.

The Commission has placed your comment on the public record pursuant to rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. §4.9(b)(6)(ii). Having considered all the facts of this case and all of the comments submitted in response to the proposed order, the

Commission has now determined that the public interest would best be served by issuing the Complaint and the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. The Commission thanks you again for your comment.

By direction of the Commission, Commissioner McSweeney not participating.

Donald S. Clark
Secretary