

**Comments of the World Privacy Forum regarding Credit-based insurance score –
Homeowners Insurance – P044804**

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex C)
600 Pennsylvania Avenue NW
Washington, DC 20580

RE: Credit-based insurance score – Homeowners Insurance – P044804

June 18, 2008

The World Privacy Forum supports the FTC's decision to use a compulsory process pursuant to Section 6 (b) of the FTC Act and Section 215 of FACTA to obtain information regarding the use of risk-based scoring from insurance companies. The FTC's model section order is thorough, and we look forward to the report.

We have one suggestion regarding the model order. In Section 6, *Credit-based Insurance Score and Credit History Data*, we urge the FTC to also ask the insurance companies about the role of identity theft in the use of scoring data and how the companies have mitigated (or not) for this issue.

For example:

Does the company have a process in place to address the impact of identity theft on insurance scores? If a process is in place, how does the company inform consumers of the process, and when? Do the companies pro-actively ask consumers about this issue? If a person is a victim of identity theft and was given a rate based on a risk score or set of risk scores impacted by fraudulent data, does the consumer have an opportunity to get a new quote after they have corrected their records? How often are consumers allowed to get a new quote? And finally, does the company have a process in place to correct after the fact a price based on an incorrect risk score due to identity theft?

Thank you for the opportunity to comment on the model order.

Respectfully submitted,

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World Privacy Forum

