To whom this may concern,

As the CEO of Blue Star Families (BSF), the largest Chapter-based nonprofit organization serving active duty of all branches, Guard and Reserve, wounded, and transitioning veterans and their families. BSF's mission is to strengthen military families and our nation by connecting military families to the communities in which they live.

Our annual Military Family Lifestyle Survey (aMFLS) is the largest and most comprehensive survey of service members, veterans, and their families. Results have informed congressional, philanthropic, and local community change including our own solutions. It is with this insight in mind, I appreciate the opportunity to share what our respondents have reported as the Commission contemplates the proposed military credit monitoring rule.

There are two major areas in which our results are most informative:

1. **Respondents support including "changes to account limits" in the definition of "material additions or modifications."** Credit card debt has remained high but stable. From 2014 to 2017, 36% to 38% of military family respondents had over $5,000 in credit card debt, and of those respondents 8%-10% had over $20,000. For this reason, we welcome any mechanisms to discourage accumulating additional credit card debt.

   The *Economic Growth, Regulatory Relief, and Consumer Protection Act* implies that Nationwide Consumer Reporting Agencies (NCRAs) ought to be and/or become entities which are trusted by consumers to provide unbiased information about their personal credit health. Although consumers will receive information about changes to credit account limits from their credit-provider, some consumers may not understand the impact(s) such changes could potentially have on their credit. Additional notification coming directly from an entrusted NCRA could further highlight its importance.

2. **We recommend adjusting the definition of "electronic notification" to better facilitate communication with service members and/or an alternate point of contact during periods of prolonged absence.** Service members have unique professional requirements (e.g., training courses and deployments) which often preclude or inhibit communication especially unencrypted communication. Forty percent of 2017's military family respondents experienced a prolonged absence/separation of six months or more in the past 18 months.

   Although many service members have access to various communications platforms during training events and/or deployment this is not always the case. We recommend adjusting the definition to include encrypted messaging platforms such as WhatsApp or Signal. Additionally, the rule in its current form does not explicitly allow service members to designate an alternate point of contact to represent them when they don't have easy access to notification platforms and/or the ability to take action if they receive an alert.

We recommend exploring options to ensure service members *or their designee* can quickly address fraudulent accounts when the NCRA identifies them.

Thank you,

Kathy Roth-Douquet
CEO, Blue Star Families