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October 23, 2001

PUBLIC VERSION

Via Federal Express

Secretary
Attention: Robert M. Frisby
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington D.C., 20580

Dear Mr. Frisby:

Re: Compliance Report - Trans Union Corporation
FTC Docket No: 9255

Trans Union LLC ("Trans Union") submits this compliance report in response to the Federal Trade Commission's ("Commission") Order of February 10, 2000 and Mr. Frisby's letter to Roger L. Longtin, an attorney for Trans Union dated April 19, 2001.

Beginning in 1999 Trans Union's List Master File no longer included "presence-of-a-tradeline" information on an individual level basis derived from its credit reporting database CRONUS. Instead, the "presence-of-a-tradeline" information was aggregated on a household basis. Models available from Trans Union for target marketing including List Master PIC, List Master Income, List Master Home Value and DAC models were also based on aggregated data rather than individual "presence-of-a-tradeline" information.

In conjunction with this change, the minimum criteria for including a consumer on the List Master File also changed. Individual consumers were identified who had one tradeline in CRONUS reported within the previous six months. The address associated with the tradeline must be verified by either another tradeline in the consumer's file or with information purchased from an outside source. Persons who met this criteria and who had the same address were identified in the List Master File as members of the same household and their information was aggregated. Additional persons with that same address were also identified in the List Master

File as members of that household, and their information was aggregated, if they have a single tradeline in CRONUS or if information from an outside source shows they have this address.

With the passage of the privacy provisions of the Gramm Leach Bliley Act ("GLBA"), Trans Union made additional changes in its target marketing business. Prior to November 13, 2000, Trans Union formed a separate entity Trans Union Content Solutions ("TUCS"). TUCS provides data for target marketing; however, this data is limited to "header data" excluding age, obtained from CRONUS prior to November 13, 2000. TUCS is engaged in target marketing using this pre-November 13, 2000 data and separately purchased data from sources not covered by the GLBA.

With this background, Trans Union provides information in response to the Commission's Order as follows:

- a) Cease and desist from distributing or selling consumer reports, including those in the form of target marketing lists, to any person unless respondent has reason to believe that such person intends to use the consumer report for purposes authorized under Section 604 of the FCRA.

Before a Trans Union customer can engage in target marketing permitted by the FCRA under § 604 in the form of prescreening for credit and insurance, Trans Union requires a signed contract ensuring the customer will make a firm offer of credit or insurance. In addition, Trans Union reviews offers to confirm that they meet the requirements of § 603(1) of the FCRA.

Trans Union distributed its standard operating procedure number 0104 ("SOP0104") with a copy of the Commission's Final Order to all Trans Union's business units and subsidiaries. (SOP0104 attached as Exhibit A)

- b) Maintain for at least five (5) years from the date of service of this Order and upon request make available to the Federal Trade Commission for inspection and copying, all records and documents necessary to demonstrate fully its compliance with this Order.

Each business unit and subsidiary has been instructed to develop and implement a document retention policy and procedure that ensures that all information relevant to the Final Order is retained for five (5) years from April 25, 2001. This policy includes the following: (1) the maintenance of a document tracking log that reflects the business units/subsidiary name, the document's identification/tracking number, the name of the document, the names and addresses of the storage location, and the time and date the documents was placed in and removed from the storage location; and (2) the labeling of all documents prior to storage. All labels must state "FTC Final Order-Docket No. 9255."



- c) Deliver a copy of this Order to all present and future management officials having administrative, sales, advertising, or policy responsibilities with respect to the subject matter of this Order.

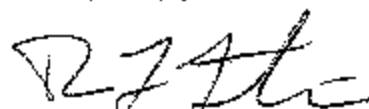
The Human Resources Department (HR) was instructed to create processes and procedures to distribute the Final Order. The distribution list included the names, title, and address of each management official with administrative, sales, advertising, and policy responsibilities. By June 30, 2001, HR distributed a copy of the Final Order notification package to each Trans Union associate on the distribution list. The Final Order notification packet included a explanatory memo from the Chief Compliance Officer and a copy of the Final Order. This distribution responsibility for new employees holding managerial responsibilities will belong to HR. The distribution responsibilities for employees transferring internally from another area in Trans Union are for those employees being promoted into a position holding managerial responsibility will belong to the employee's new immediate supervisor.

- d) For the five (5) year period following the entry of this Order, notify the Commission at least thirty (30) days prior to any proposed change in respondent such as dissolution, assignment, sale or change in control resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries, or any other change in the corporation that might affect compliance obligations arising out of this Order.

As of the date of this letter, the only change responsive to this requirement has been the formation of TUCS described supra. Other than an initial snapshot of "above the line" information, excluding age, from CRONUS, TUCS has no access to the CRONUS file or any other Trans Union database derived from CRONUS. TUCS separately purchases data for target marketing from a variety of sources, excluding financial institutions as that term is used in the GLBA.

Trans Union requests that Exhibit A hereto be kept confidential. It is an internal Trans Union document describing its corporate organization and procedures not available to the public and kept confidential at Trans Union. A copy of this letter being submitted without the attachment.

Very truly yours,



Roger L. Longtin

I, Barry A. Botruff, an Officer of Trans Union LLC affirm that the facts submitted in this Compliance Report are true.



Barry A. Botruff

SUBSCRIBED and SWORN to
before me this 23rd day of
October 2001.



Notary Public





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December 21, 2001

PUBLIC VERSION

Secretary
Attention: Robert M. Frisby
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington D.C., 20580

Dear Mr. Frisby:

Re: Compliance Report - Trans Union Corporation
FTC Docket No: 9255

I have received your letter of November 30, 2001 asking for additional information in connection with Trans Union's compliance report dated October 23, 2001. Your letter contains eight specific requests. Request 1, 2 and 3 deal with Trans Union's practices in connection with credit and insurance prescreening permitted by the FCRA. You are probably aware that these practices are the subject of a consent decree between the Commission and Trans Union. This consent decree obligates Trans Union, among other things, to obtain a contract from its customers for these lists which requires them to make a "firm" offer of credit. Against this background it is difficult to find the connection between the Commission's cease and desist order directed at Trans Union's target marketing business and your questions directed at its permitted credit and insurance prescreening business.

Dealing specifically with your request for additional information, Trans Union's responses are as follows:

1. Yes.
2. An executed contract effective July 30, 2001 attached hereto as Exhibit A.
3. On or before April 25, 2001, Trans Union received customer criteria for selecting consumers for firm offers of credit or insurance permitted by the FCRA. Trans Union, by



contract, requires these customers to make firm offers in compliance with the FCRA. As a business practice, Trans Union reviews the mail pieces to confirm that firm credit and insurance offers are being made but Trans Union does not assume any of the responsibilities of its customers to comply with the FCRA, nor does it audit its customers to confirm that its final acceptance or rejection decisions meet the requirements of § 603(l);

4. SOP0104 was distributed to business units and subsidiaries on 6/19/01;

5. Trans Union's business units involved in the marketing and production of products for target marketing were required to provide the matrix and certification called for in SOP0104 those matrices and certifications are attached hereto as Exhibit B;

6. See answer to No. 6 above; and

7. "Name and address" and "above the line" as used in my letter mean a consumer's name and address and social security number.

Trans Union requests that Exhibits A and B hereto be kept confidential. These are internal Trans Union documents describing its customer relationships and its products that are not available to the public and kept confidential by Trans Union. A copy of this letter is being submitted without the attachments.

Very truly yours,



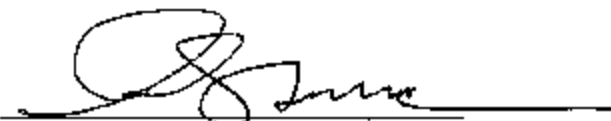
Roger L. Longtin

RLL/jcp
Enclosure

I, Barry A. Botruff, an Officer of Trans Union LLC affirm that the facts submitted in this Compliance Report are true.


Barry A. Botruff

SUBSCRIBED and SWORN to
before me this 21st day of
December 2001.


Notary Public

