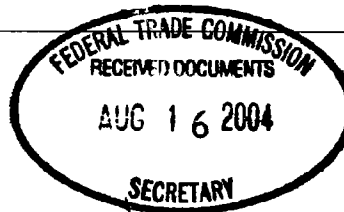




ChoicePoint



August 16, 2004

Federal Trade Commission
Office of the Secretary
Room H-159 (Annex N)
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

RE: FACT Act Scores Study, Matter No. P044804

Thank you for the opportunity to comment on Section 215 of the FACT Act regarding the study on the effects of credit-based insurance scores on the availability and affordability of property and casualty insurance. ChoicePoint's comments focus on the requirement that the FTC and the Board study the statistical relationship between credit-based insurance scores and actual loss.

ChoicePoint is a publicly traded company based in Alpharetta, Georgia. We are a leading provider of credentialing verification services to government and the private sector. Many of our products are designed to service the specific needs of our insurance customers including credit-based insurance scores.

ChoicePoint has participated in numerous public and private actuarial examinations of the correlation between credit-based insurance scores and loss experience. Based upon this experience we offer some observation on the study design.

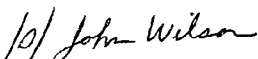
We recognize that a primary consideration of the study is the potential usefulness of its results. In the context of identifying a relationship between the score and loss we believe study should included the following criteria:

1. Include a countrywide sample of actual policy holders whose claims experience can be identified during a predetermined policy period.
2. Only one scoring tool be used for each line of insurance examined.
3. The study examine pure premium by insurance score groupings to avoid the complications that arise from variations in individual insurers rate plans.
4. A multi-variant analysis technique be used so as to adjust for any interaction between the score and other risk factors.

Any additional criteria should be in compliance with standards set by the Casualty Actuarial Society and the American Academy of Actuaries to ensure the highest degree of reliability in the study's conclusions.

As we have done in previous studies, ChoicePoint offers it continued assistance either in a consulting capacity on the study design or providing the actual scores.

Respectfully,


John Wilson
Assistant Vice President