



CUNA & Affiliates
A Member of the Credit Union System

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April 16, 2004

Federal Trade Commission
FACTA Free Reports
Post Office Box 1031
Merrifield, VA 22116-1031

RE: FACTA Free File Disclosures Proposed Rule,
Matter No. R411005

Dear Sir or Madam:

The Credit Union National Association (CUNA) is pleased to respond to the Federal Trade Commission's proposed rule regarding the establishment of a centralized source through which consumers may request a free annual file disclosure from each nationwide consumer reporting agency, as required under the Fair and Accurate Credit Transactions (FACT) Act. By way of background, CUNA is the largest credit union trade association, representing more than 90% of our nation's nearly 9,800 state and federal credit unions.

CUNA supports the provisions of the FACT Act and the proposed rule regarding the process in which consumers may request their credit information. We have one suggestion that we believe will improve this process.

These provisions should result in an increase in the number of consumers that request their credit information. These consumers may have questions to help them understand the information provided by the consumer reporting agencies. We believe the rule should impose a requirement that the consumer reporting agencies provide contact information which consumers may use in order to ask the questions that will help them understand the information on their credit report. This would be separate from the responsibilities that credit unions and other creditors have under the FACT Act with regard to the resolution of disputes.

We believe this requirement will help fulfill one of the objectives of the FACT Act, which is to ensure that consumers have access to credit information, and the contact information would be appropriate for the following reasons:

- It will ensure that the consumer is contacting the source, the credit reporting agency, that is most likely to be able to respond to these consumer inquiries.



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- It will encourage the consumer reporting agencies to provide the information in an understandable manner in order to minimize such inquiries.

Thank you for the opportunity to comment on the proposed rule regarding the establishment of a centralized source through which consumers may request free annual file disclosures. If you have questions about our comments, please contact Associate General Counsel Mary Dunn or me at (202) 638-5777.

Sincerely,



Jeffrey Bloch
Assistant General Counsel