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September 18, 2009

The Honorable Michael McRaith
Chair, NAIC Property and Casualty Insurance Committee
The Honorable Kim Holland
Chair, NAIC Market Regulation and Consumer Affairs Committee

Dear Commissioners McRaith and Holland:

I write on behalf of the Consumer Data Industry Association (CDIA) to offer comments regarding the

There is a substantial body of federal and state consumer reporting regulation and corresponding judicial interpretations from federal and state jurisdictions. All of this regulation is more than sufficient for consumer reporting agencies and no further regulation as an advisory organization is necessary. Further, there has not been a demonstrated need to warrant further regulation of consumer reporting agencies as advisory organizations.

We hope that this comment is helpful to you. We welcome questions any time.

Sincerely,

Eric J. Ellman
Vice President, Public Policy and Legal Affairs

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