Received via email from Birny Birnbaum Friday, September 18, 2009 10:03 AM To: Kim Holland; McRaith, Michael Subject: Credit Scoring Modelers as Advisory Organizations

Commissioners Holland and McRaith,

The Center for Economic Justice (CEJ) offers the following in response to the request for comments on whether insurance scoring modelers should be regulated as advisory organizations. e2ffell

Thanks for your consideration,

Birny Birnbaum

W:\Sep09\Cmte\C\Advisory Organization Language Comments\CEJ Comments.doc