



You're Not Alone: CFPB Complaints On The Rise



May 2019

You're Not Alone

CFPB Consumer Complaints on the Rise

U.S. PIRG Education Fund

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Executive Summary

Created in the wake of the 2008 financial crisis, the Consumer Financial Protection Bureau, or CFPB, has been a critical ally for consumers in the financial marketplace. Throughout its history, the CFPB has secured \$12.4 billion in relief for more than 31 million wronged consumers,¹ provided recourse to consumers facing problems with financial companies, and acted against companies that break the law.

In late 2011, the CFPB established its “Consumer Complaint Database,” which is meant to facilitate resolutions to problems faced by consumers and hold companies accountable. The CFPB has received more than 1.5 million complaints and published 1,197,145 of them as of January 14th, 2019.^{2 3} **In 2018, the CFPB published more than 257,000 complaints, more than any previous year.** In about 97% of cases, companies respond to consumers in a timely manner.

The CFPB database can be searched and filtered by several criteria, including by company, by product, by state, and by response from the company. Using this data set, we were able to identify problems in the financial marketplace, as well as suggest actions that can improve consumers’ financial experiences. In this report, we analyze the complaint database on a national and state level and provide recommendations for how to protect consumers.

Key findings include:

- Nearly half of the complaints in the database are filed against ten companies: Equifax, Experian, TransUnion, Bank of America, Wells Fargo, JPMorgan Chase, Citibank, Capital One, Navient, and Ocwen.
- The three nationwide credit reporting agencies - Equifax (9% of complaints), Experian (8%) and TransUnion (7%) - are the most complained about companies in the database. They have also been the most complained about companies for each of the past four years.
- “Credit reporting, credit repair services, or other personal consumer reports” complaints made up 43% of total complaints in 2018, up from 23% of total complaints in 2016.
- “Credit reporting, credit repair services, or other personal consumer reports” is the most complained about product category in 29 states and the District of Columbia, with Equifax receiving the most complaints in 25 states and the District of Columbia.
- 69% of complaints in the database are about three products: “credit reporting, credit repair services, or other personal consumer reports,” “mortgage,” and “debt collection.”
- 97 percent of complaints received a timely response. Additionally, more than 223,000 complaints resulted in relief for consumers, including more than 75,000 who received monetary relief from the companies they complained about

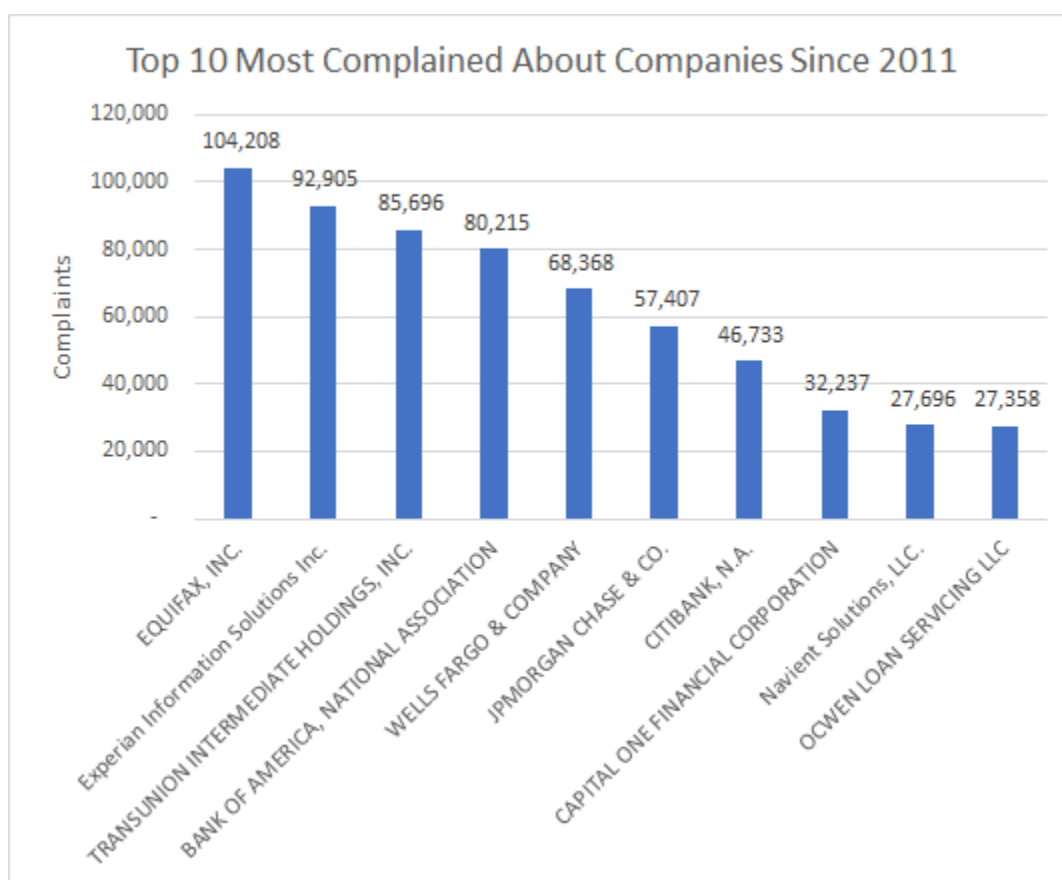
Consumer Complaints by Company

There were 1,197,145 complaints logged in the Consumer Financial Protection Bureau (CFPB) complaint database, as of January 14th, 2019.⁴ We looked at these complaints by company, product, and state.

Of the nearly 1.2 million complaints in the database, the top ten most complained about companies generated nearly half (**49%**) of all total complaints. (See Figure 1.)

Among those top ten companies, the three major credit reporting agencies (also known as CRAs or credit bureaus) - Equifax (9% of total complaints), Experian (8%), and Transunion (7%) - are the three most complained about companies.

Figure 1.



The next five most complained about companies are big banks - Bank of America, Wells Fargo, JPMorgan Chase, Citibank, and Capital One. Rounding out the top ten are Navient Solutions, a student loan servicer,⁵ and Ocwen Loan Servicing, a mortgage servicer.

On a state-by-state basis, Equifax is also the most complained about company in half of the country.⁶ Equifax is followed by Bank of America (11 states) and Wells Fargo (7 States). (See Figure 13.)

Among the most complained about companies, credit bureaus have been under increasing scrutiny in recent years. Credit bureau complaints skyrocketed since news of the massive Equifax data breach in September 2017. (See Figure 6.) The firm exposed the Social Security numbers and birthdates of nearly 150 million Americans.⁷

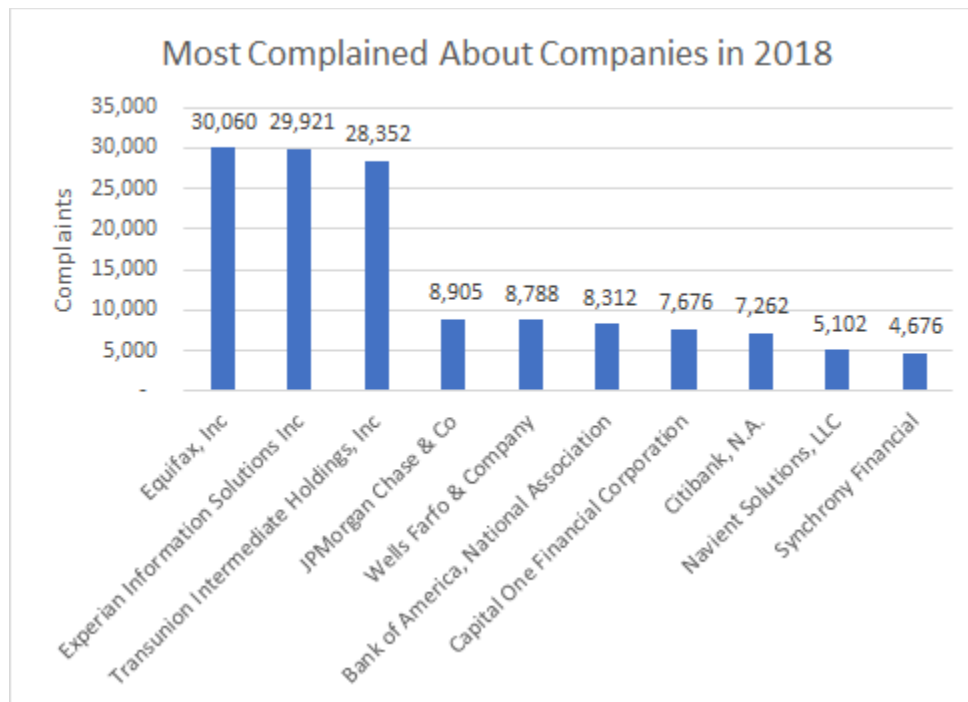
Still, credit bureau problems faced by consumers long precede the Equifax breach. The three national credit bureaus have been the most complained about companies for each of the past four years in a row. (See Table 1.)

Table 1. Top 5 Most Complained About Companies Per Year

Rank	2018	2017	2016	2015	2014	2013	2012
1	Equifax	Equifax	Equifax	Equifax	Bank of America	Bank of America	Bank of America
2	Experian	TransUnion	Experian	Experian	Experian	Wells Fargo	Wells Fargo
3	TransUnion	Experian	TransUnion	TransUnion	Equifax	JPMorgan Chase	JPMorgan Chase
4	JPMorgan Chase	Navient	Wells Fargo	Bank of America	Wells Fargo	Citibank	Citibank
5	Wells Fargo	Wells Fargo	Bank of America	Wells Fargo	TransUnion	Experian	Capital One

The three credit bureaus drew 88,333 of the total 257,193 complaints in 2018, representing 34% of complaints for the year. In 2018, the least complained about credit bureau (TransUnion) still received more than three times as many complaints as JPMorgan Chase, the most complained about non-credit bureau for the year. (See Figure 2.)

Figure 2.



The complaints against the three nationwide credit bureaus are particularly worrisome since consumers do not choose to do business with these companies. A consumer can respond to wrongdoing by a bank, for example, by simply choosing a competitor. But with credit bureaus, you cannot vote with your feet. The bureaus collect and sell your information without your consent, which is why strong oversight by the CFPB is needed.⁸

Since 2011, complaints against the top three companies, Equifax, Experian and Transunion, were mainly about the “credit reporting, credit repair services, or other personal consumer reports.”⁹ For Bank of America, JPMorgan Chase, and Wells Fargo, the top complaint product category was “mortgage.” For both Capital One and Citibank, “credit card or prepaid card” complaints was the most common product category. (See Table 2.)

The CFPB’s database also tracks whether complaints were resolved. According to a 2018 CFPB annual report, “monetary relief” is defined as “objective, measurable, and verifiable” monetary relief to the consumer in response to the complaint. “Non-monetary relief” represents other objective and verifiable relief in response to a complaint, including mortgage foreclosure alternatives that help consumers keep their homes, protecting consumers from unwanted debt collection calls, and correcting incorrect information on credit reports.¹⁰

Table 2. Most Complained About Products for the Ten Most Complained about Companies Since 2011

Rank	Company	Most Complained About Product
1	Equifax	Credit reporting, credit repair services, or other personal consumer reports
2	Experian	Credit reporting, credit repair services, or other personal consumer reports
3	TransUnion	Credit reporting, credit repair services, or other personal consumer reports
4	Bank of America	Mortgage
5	Wells Fargo	Mortgage
6	JPMorgan Chase	Mortgage
7	Citibank	Credit card or prepaid card
8	Capital One	Credit card or prepaid card
9	Navient Solutions	Student loan
10	Ocwen Loan Servicing	Mortgage

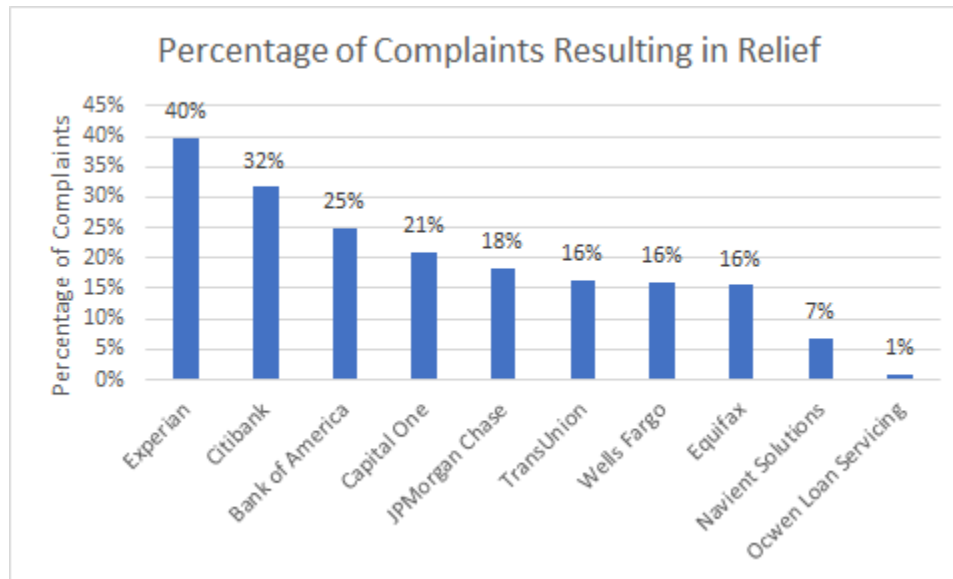
Companies provide monetary or non-monetary relief to consumers 18% of the time. More than 223,000 complaints resulted in relief for consumers, including more than 70,000 who received monetary relief from the companies they complained about. (*See Table 3.*)

Table 3. Company Responses to Complaints¹¹

Company Response	Number of Complaints	Percentage of Total Complaints
Closed with explanation	944,180	79%
Closed with non-monetary relief	147,162	12%
Closed with monetary relief	75,887	6%
Closed (without relief or explanation)	17,611	1%
In progress	6,354	1%
Untimely response	5,945	1%

Companies can also be ranked by the percentage of complaints resulting in monetary or non-monetary relief. *(See Figure 3.)*

Figure 3.



Of the ten most complained about companies, complaints against Experian, Citibank, and Bank of America resulted in the highest percentages of relief. (See Table 4.)

At about 18%, Citibank had the highest percentage of complaints resolved with monetary relief. Experian, which provided the highest overall rate of relief, resolved just under 1% of complaints with monetary relief. Credit bureaus are far less likely to respond to complaints with monetary relief, as all three nationwide CRAs provided monetary relief in less than 1% of the complaints against them.¹²

There is a large difference in the relief rates between Experian and its direct competitors, Equifax and TransUnion. Complaints against Experian are resolved with relief 40% of the time, compared to 16% for TransUnion and Equifax.¹³ An FTC study found that a quarter of consumers allege incorrect information on at least one of three credit reports.¹⁴ Due to these mistakes on credit reports, a lack of relief could prevent consumers from getting approved for credit or getting hired for a job.

Of the ten most complained about companies, Navient Solutions and Ocwen Loan Servicing provided the lowest rate of relief to consumers. This is particularly worrisome because Navient has been accused of misapplied payments, obscure notices, processing errors, and steering of borrowers into more costly repayment options.¹⁵ Ocwen also recently settled with Massachusetts and agreed to pay \$2 million in restitution to borrowers due to servicing abuses.¹⁶

Table 4. Top Ten Most Complained About Companies Ranked by Rate of Relief Provided to Consumers

Rank	Company	Total Complaints	% of Complaints Resulting in Relief	% of Complaints Resulting in Monetary Relief
1	Experian	92,905	40%	1%
2	Citibank	46,733	32%	18%
3	Bank of America	80,215	25%	12%
4	Capital One	32,237	21%	11%
5	JPMorgan Chase	57,407	18%	12%
6	TransUnion	85,696	16%	0%
7	Wells Fargo	68,368	16%	9%
8	Equifax	104,208	16%	0%
9	Navient Solutions	27,696	7%	3%
10	Ocwen Loan Servicing	27,358	1%	1%

Once a company responds to a complaint, either with or without relief, the consumer can choose to dispute the response to the complaint. Consumers disputed responses from credit bureaus at the lowest rate for the top ten most complained about companies, despite having submitted the most complaints against these companies. (*See Table 5.*) Ocwen, which only provided relief for 1% of its complaints, had the highest rate of disputed responses.

Table 5. Top Ten Most Complained About Companies Ranked by Percent of Responses Disputed

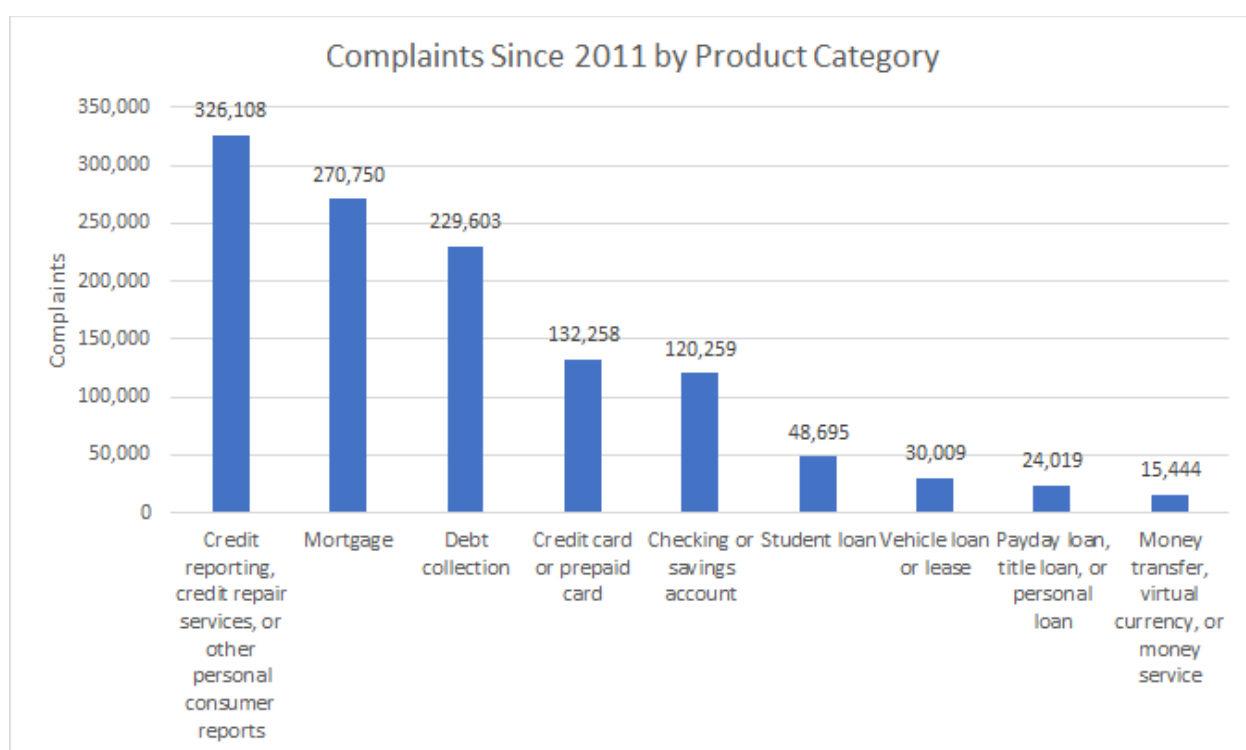
Rank	Company	Total Complaints	Disputed Responses	% Disputed
1	Ocwen Loan Servicing LLC	27,358	5,719	21%
2	Bank of America, National Association	80,215	14,387	18%
3	Wells Fargo & Company	68,368	11,717	17%
4	JPMorgan Chase & CO.	57,407	9,523	17%
5	Citibank, N.A.	46,733	6,697	14%
6	Capital One Financial Corporation	32,237	3,655	11%
7	Navient Solutions, LLC.	27,696	3,083	11%
8	Equifax, Inc.	104,208	10,079	10%
9	TransUnion Intermediate Holdings, Inc.	85,696	5,638	7%
10	Experian Information Solutions Inc.	92,905	5,330	6%

Consumer Complaints by Product

In addition to breaking the complaints down by company, the database is also broken down by products that have negatively affected consumers.

When submitting a complaint to the database, consumers can currently choose a product from nine distinct product categories.¹⁷ Of the nearly 1.2 million complaints filed in the CFPB database, 69% are about three types of products: “credit reporting, credit repair services, or other personal consumer reports,” “mortgage,” and “debt collection.” (See Figure 4.)

Figure 4.



Complaints about credit reporting issues have skyrocketed in recent years. Credit reporting complaints for 2018 were more than double the number for the second most complained about product, debt collection. (See Figure 5.) Credit reporting complaints in 2018 comprised over 43% of the year’s total complaints, up from 23% in 2016. (See Figure 6.)

Figure 5.

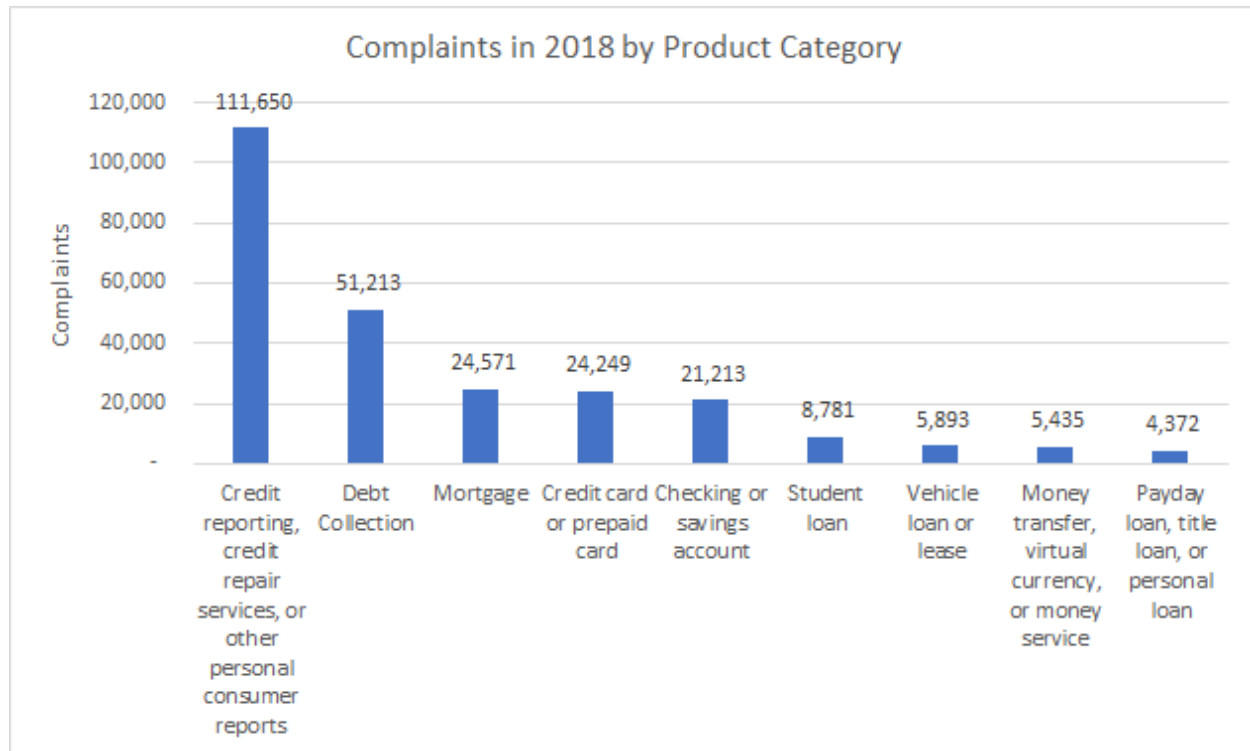
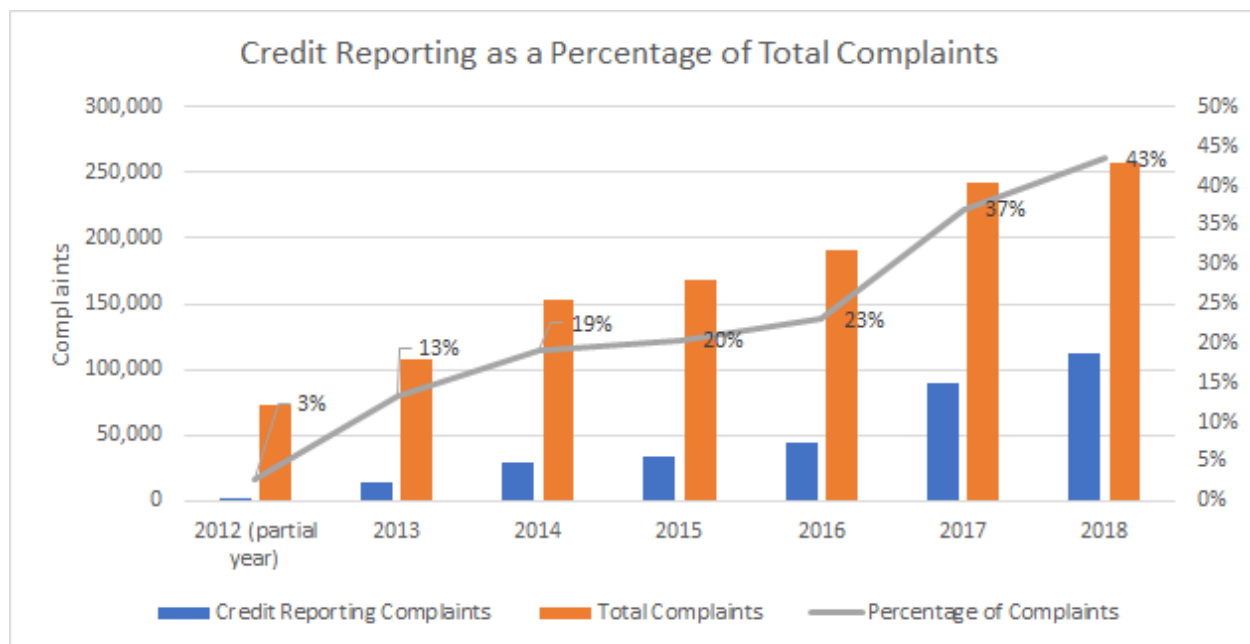
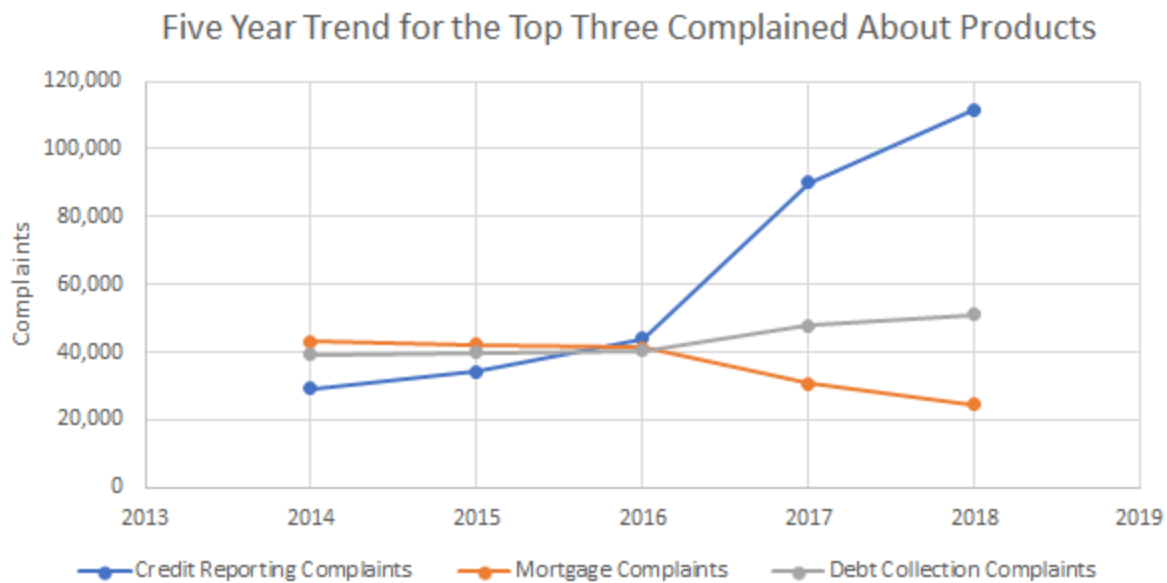


Figure 6.



Mortgage complaints have declined over the past five years, while debt collection complaints are steadily increasing. (See Figure 7.)

Figure 7.

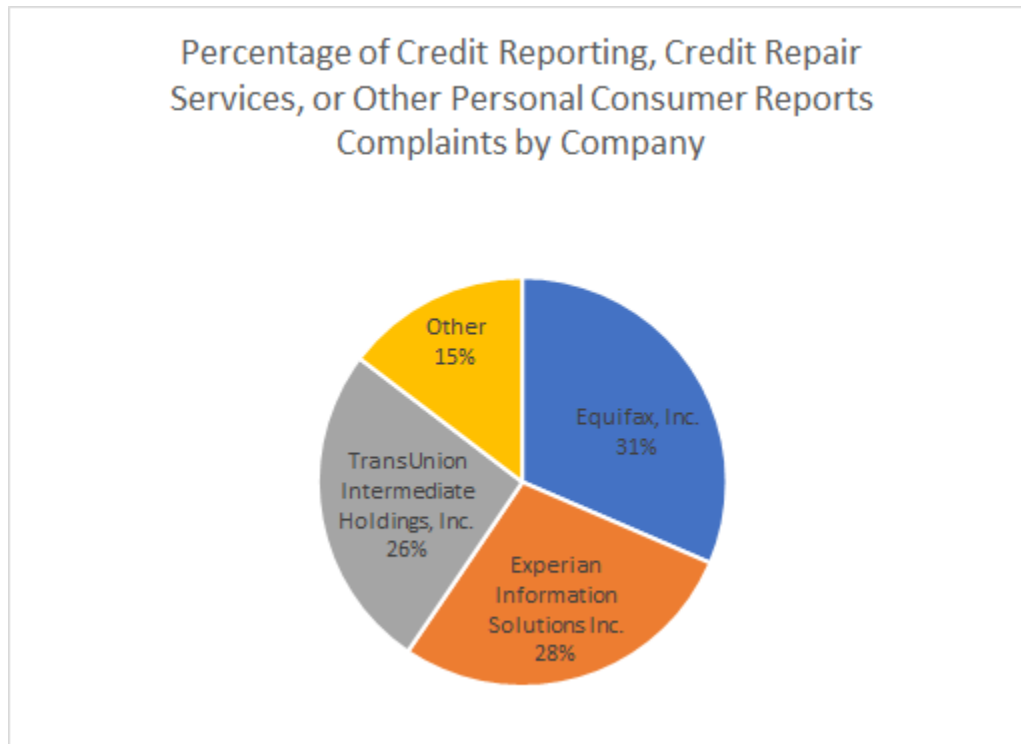


Credit reporting complaints have increased since the 2017 Equifax data breach that affected nearly 150 million Americans. The 2017 CFPB Consumer Response Annual Report says complaints against credit bureaus include breach complaints as well as customer service issues in the aftermath of the breach.¹⁸ However, complaints against credit bureaus also increased during recent years prior to the breach as compared to total complaints, showing that consumer problems with credit reporting go beyond the data breach.

In 2018, 61% of consumers identified incorrect information as their main issue with credit reporting.¹⁹ According to National Consumer Law Center’s Chi Chi Wu, causes of incorrect information include furnishers giving credit bureaus incorrect information, credit bureaus incorrectly matching individual files, and credit bureaus failing to remove fraudulent activity on reports caused by identity theft.²⁰ According to Wu, incorrect information on a credit report “can cost a consumer thousands of dollars in higher-priced credit, or worse yet, result in the denial of a job, insurance coverage, an apartment rental, the ability to open a small business, or to buy a house.”²¹ Stricter verification standards are needed for credit bureaus to confirm correct information.

Within the credit reporting industry, the three nationwide credit reporting agencies (Equifax, Experian, and TransUnion) represent 278,249 credit reporting complaints, or **85%** of all such complaints. (See Figure 8.) Most complaints against the Big 3 credit bureaus cite mistakes on credit reports, which they may be less responsive to solving because consumers are not their direct customers.²²

Figure 8.

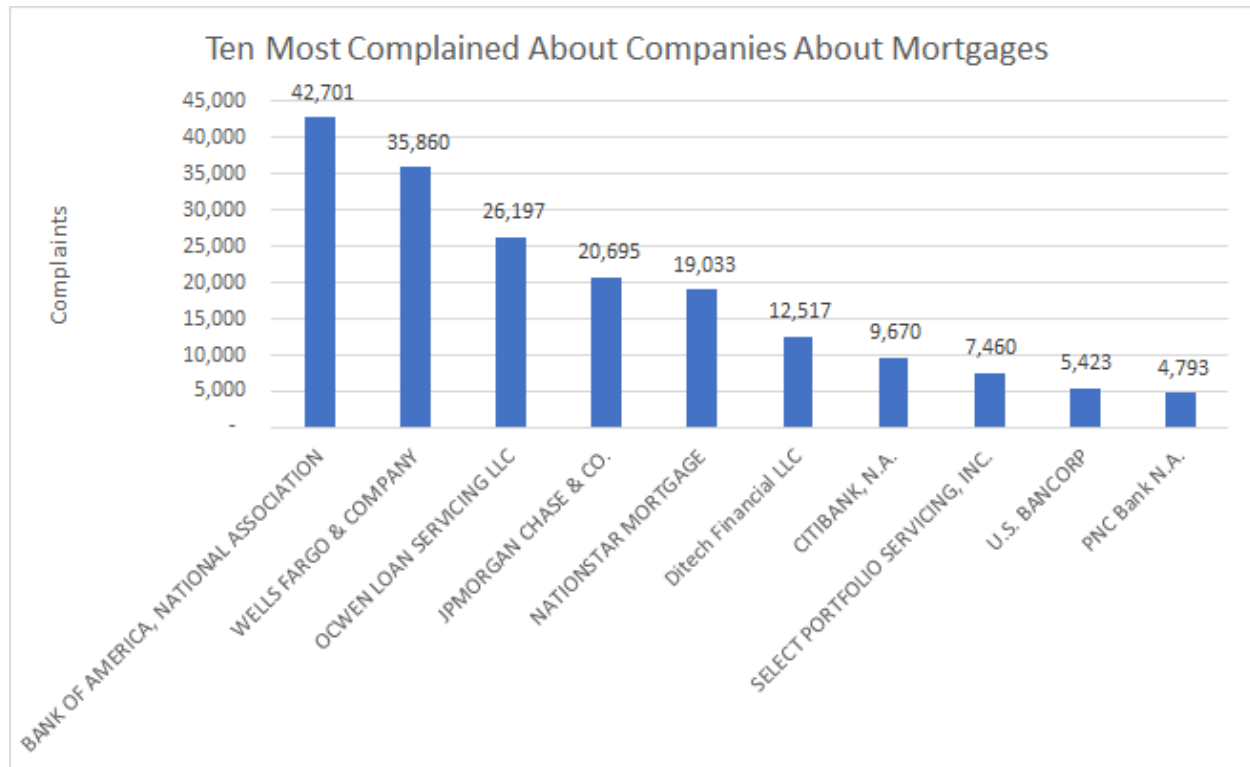


In the mortgage product category, the most complained about companies include many of the nation's largest banks. 3 out of the top 5 companies that received the most mortgage complaints are Bank of America, Wells Fargo, and JPMorgan Chase. (*See Figure 9.*) The reason for this high number of complaints may partially have to do with these companies being among the largest in the nation and thus having a significant share of the marketplace. However, the biggest banks engaged in abusive mortgage practices that contributed to the 2008 economic crash. A \$25 billion settlement was reached with the 5 largest mortgage servicers in 2012 for abuses such as deceptive loan modification offerings and failure to provide alternatives to foreclosure.²³

Of the mortgage complaints in the CFPB database, the two biggest issues include problems when consumers struggle to pay and have trouble during the payment process.²⁴

According to CFPB annual reports, some issues that consumers who are struggling or unable to make payments face are delays and ambiguity with modification applications as well as surprise fees associated with the foreclosure process.²⁵ Consumers also report problems during the payment process due to confusion over the transfer of their loan to a new servicer or a change in the point of contact.²⁶ By improving communication channels and transparency, mortgage providers and servicers can improve customer relations.

Figure 9.

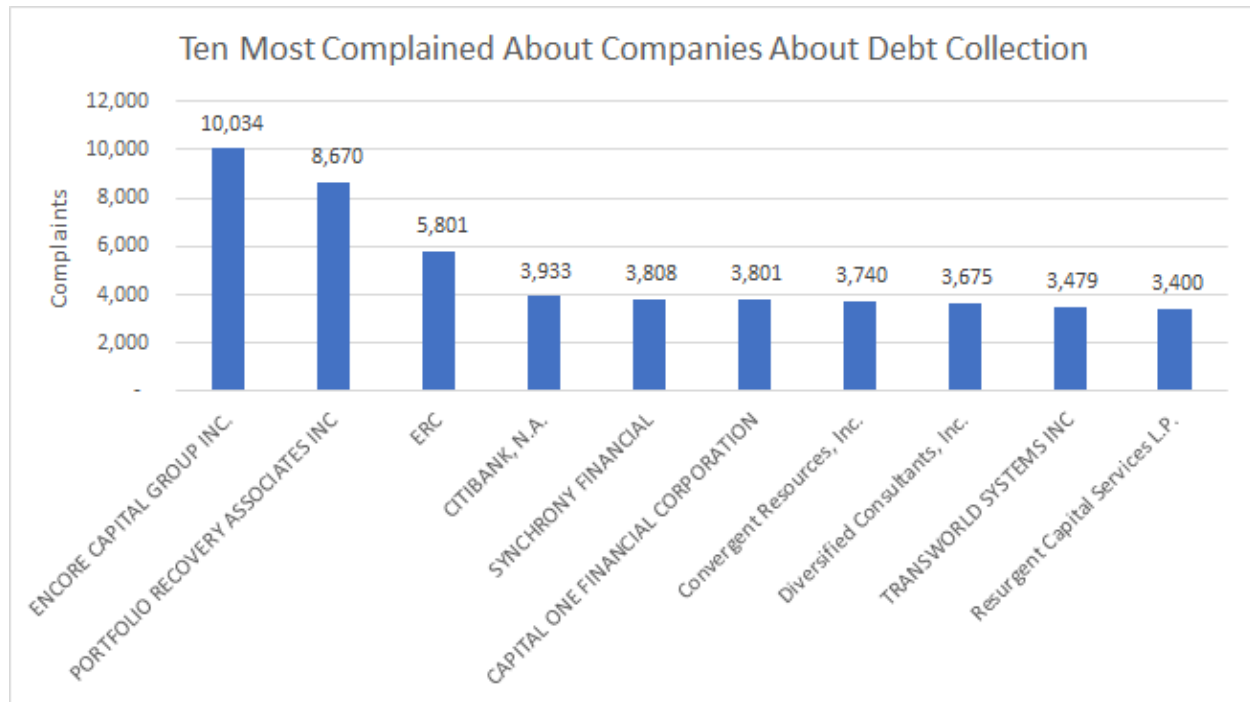


Debt collection is the third most complained about product in the CFPB database. Among the complaints filed against debt collection companies in 2018, attempts to collect debt not owed is the most common issue that consumers claim, making up 44% of total debt collection complaints.²⁷ Debt collection problems arise from deceptive and predatory tactics, including targeting consumers that do not owe debt. Additionally, the fact that the top ten most complained about debt collection companies make up just 22% of total debt collection complaints might be an indication that the debt collection industry is not as concentrated as other industries.^{28 29} The CFPB should continue its efforts toward drafting a rule on debt collection but only if it ensures that its proposals serve consumers, not debt collectors.³⁰

According to the CFPB's Consumer Response Annual Report, consumers often complained about debts appearing on their credit reports without receiving written notice of the debt. In some cases, consumers claimed to have reached out to the company to try to verify the debt but struggled to get a response.³¹

Below is a chart showing the top ten most complained about debt collection companies. *(See Figure 10.)*

Figure 10.



Consumer Complaints by State

The number of complaints in the CFPB’s database varies from state to state. We analyzed complaints by state by adjusting for the number of residents living in each state.³² (See Figure 11.) The District of Columbia had the most complaints per 100,000 residents (924), followed by Delaware, Georgia, Maryland, and Florida. (See Table 6.)

Figure 11.

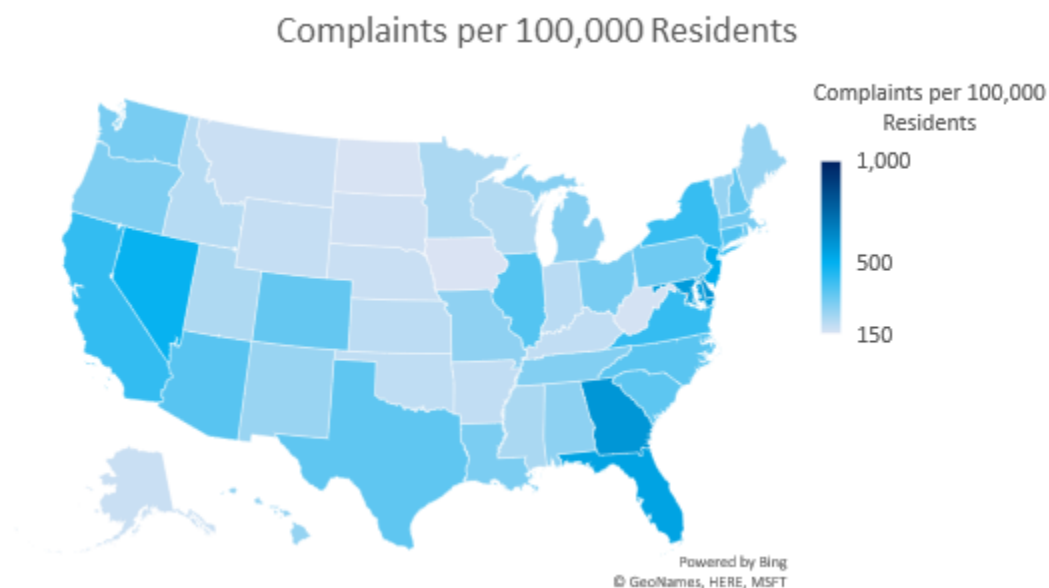


Table 6. Most Complaints per Capita per State

Rank	State	Total Complaints	Population	Complaints per 100,000 Residents
1	DC	6,491	702,455	924
2	DE	5,843	967,171	604
3	GA	62,068	10,519,475	590
4	MD	34,691	6,042,718	574
5	FL	115,910	21,299,325	544
6	NJ	45,102	8,908,520	506
7	NV	14,848	3,034,392	489
8	CA	165,522	39,557,045	418
9	VA	35,330	8,517,685	415
10	NY	80,404	19,542,209	411

We also looked at the most complained about companies and products in each state. While Equifax is the most complained about company in half of the country (25 states and DC), Bank of America generates the most complaints in 11 states, including on the West Coast and in New England, and Wells Fargo is the most complained about in 7 states. (*See Figures 12 and 13*).

Figure 12.

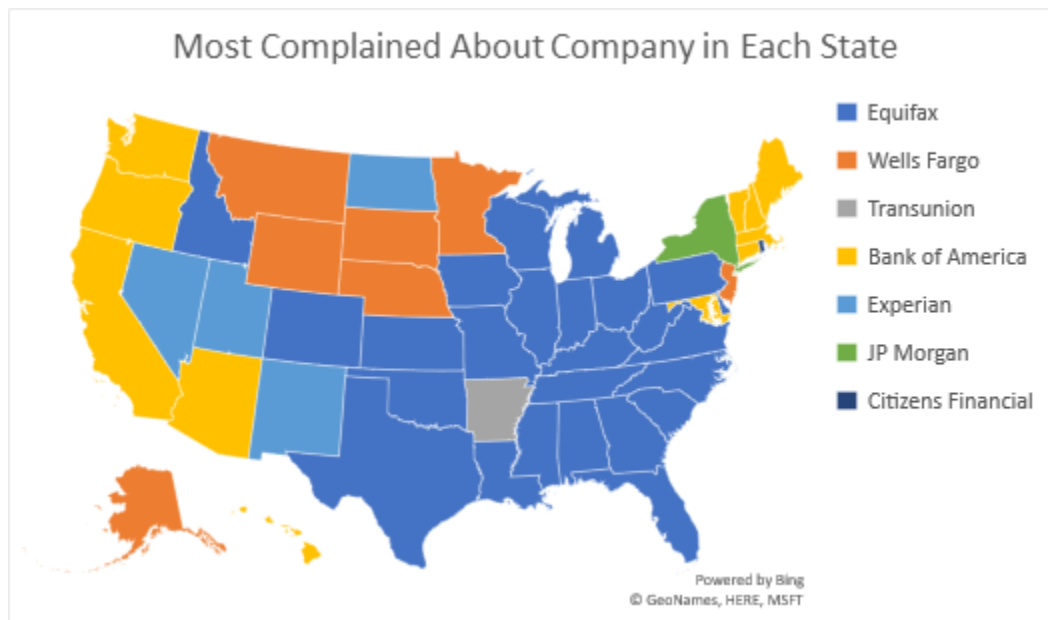
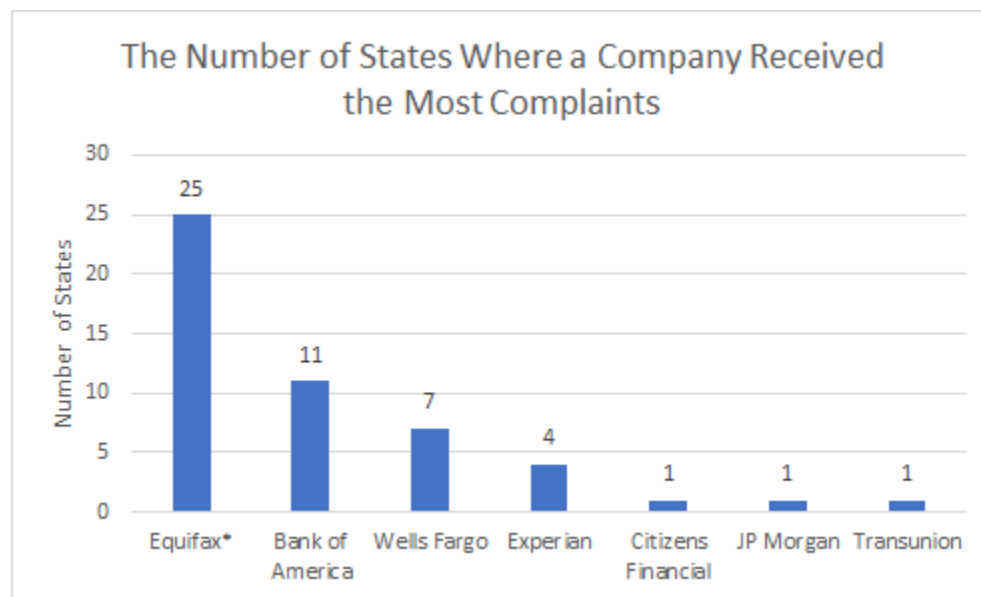


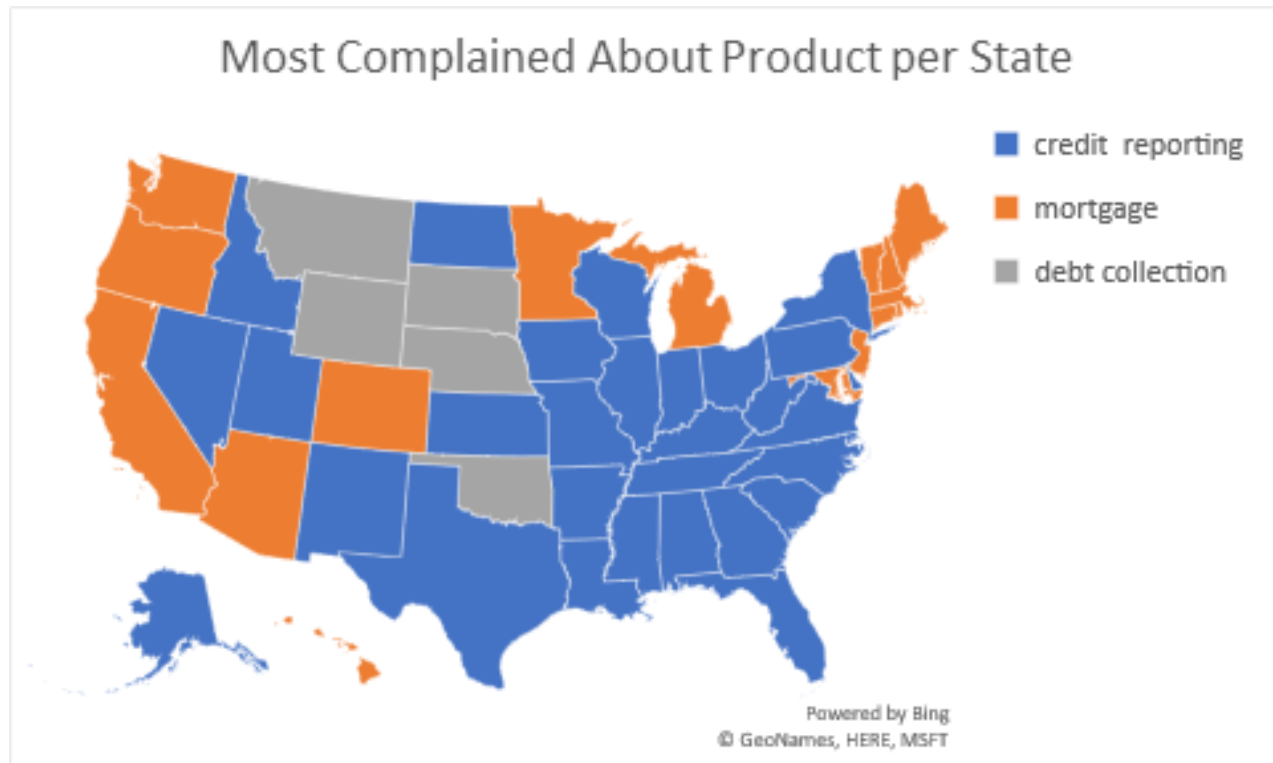
FIGURE 13.



**Equifax received the most complaints in 25 states and the District of Columbia.*

Just as credit reporting is the most complained about product nationally, it is also the most complained about in 29 states and DC. Debt collection is the most common complaint in Montana, Nebraska, Oklahoma, South Dakota and Wyoming, while mortgage issues make up the most common complaint on the West Coast, in New England, and in six other states. (See Figure 14.)

Figure 14.



Conclusion

In this report, we looked at all complaints in the CFPB complaint database and found that consumers are still facing problems in the financial marketplace. The CFPB has received more than 1.5 million complaints and published 1,197,145 of them as of January 14, 2019. As seen in our analysis of the complaints in the database, nearly half of complaints in the database are against ten companies, with the three national credit bureaus (Equifax, Experian, and TransUnion) receiving the most complaints.

When analyzing the products in the database, “credit reporting, credit repair services, or other personal consumer reports,” “mortgage,” and “debt collection” were the top three most complained about products, generating 69% of complaints.

Action can be taken by the CFPB to protect consumers, including conducting oversight of the credit bureaus to ensure compliance with the Fair Credit Reporting Act, introducing stricter verification standards for credit report information, requiring mortgage servicers and originators to improve their communication channels and transparency, and continuing to draft a rule on debt collection.

The CFPB database has been a useful tool in helping resolve problems faced by consumers and holding companies accountable. Going forward, we encourage the CFPB to maintain public access to a vibrant, transparent, and complete consumer complaint database that encourages consumers, competitors, academics, other researchers, and the complained-about-companies themselves to study ways to reform the marketplace.

Methodology

CFPB consumer complaint data were downloaded from <https://www.consumerfinance.gov/data-research/consumer-complaints/> on January 14th, 2019. Complaints were downloaded in bulk as a CSV file, and totaled by company, product, relief, and state using Microsoft Access. We analyzed data posted in the database from December 1st, 2011, when the CFPB began collecting complaints, to January 14th, 2019, when we downloaded the data.

This analysis reflects only those complaints published in the CFPB's online Consumer Complaint Database. As a result, complaint totals and breakdowns are slightly different from the CFPB's own complaint research, which is based on total complaints received, rather than just those complaints that are published.³³ The CFPB's online complaint database only publishes complaints that involve financial products within the CFPB's jurisdiction, are submitted by consumers with proven commercial relationships with the identified companies, are not duplicate complaints, and are not whistleblower complaints.³⁴

Population data were taken from the U.S. Census Bureau 2018 National and State Population Estimates.³⁵ We then divided the number of consumer complaints by individual state populations to normalize for state population size.

Table calculations involving percentages were rounded to the nearest whole number, meaning the total percentage may not add up to 100%.

Product Labels

In April 2017, labels for products, issues, and sub-issues in the CFPB database changed. For the purpose of this report, we combined old and new labels that represent the same product categories. We followed the CFPB's guide on which old and new labels represent the same product categories: https://files.consumerfinance.gov/f/documents/201704_cfpb_Summary_of_Product_and_Sub-product_Changes.pdf.

Below (*Table 7*) are the new product labels as of April 2017, with an explanation of which old labels correspond with them.

Table 7. Product Category Name Changes

Current Product Label	Previous Labels
Credit reporting, credit repair services, or other personal consumer reports	<i>Credit reporting</i> and <i>Credit repair</i> (which was a sub-product of <i>Other financial services</i>)
Mortgage	No change to label
Debt Collection	No change to label
Credit card or prepaid card	<i>Credit card</i> and <i>Prepaid card</i> (excluding the <i>Mobile wallet</i> sub-product)
Checking or savings account	<i>Bank account or service</i>
Student loan	No change to label
Vehicle loan or lease	<i>Vehicle loan</i> and <i>Vehicle lease</i> (which were sub-products of <i>Consumer loan</i>)
Payday loan, title loan, or personal loan	<i>Payday loan</i> and <i>Installment loan</i> , <i>Pawn loan</i> , <i>Title loan</i> , and <i>Personal line of credit</i> (which were sub-products of <i>Consumer loan</i>)
Money transfer, virtual currency, or money service	<i>Money transfers</i> ; <i>Mobile wallet</i> (which was a sub-product of <i>Prepaid card</i>); and <i>Check cashing</i> , <i>Debt settlement</i> , <i>Foreign currency exchange</i> , <i>Money order</i> , <i>Refund anticipation check</i> , and <i>Traveler's/Cashier's check</i> (which were sub-products of <i>Other financial services</i>)

Company Response Labels

Company response labels changed in the database over time. We combined complaints with different company response labels that represented the same type of response.

The “closed with relief” label is an original label in the database that was used for complaints that were only closed with monetary relief.³⁶ It was discontinued in 2012. The “closed with monetary relief” label is used for complaints that resulted in objective, measurable, and verifiable monetary relief for the consumer.³⁷ Therefore, we combined “closed with relief” complaints and “closed with monetary relief” complaints.

The “closed without relief” label is an original label in the database that was used for complaints that were closed without relief but with an explanation.³⁸ It was discontinued in 2012. The “closed with explanation” label means that the company provided an explanation that either satisfied the consumer without providing relief or explained why no further action would be taken.³⁹ Therefore, we combined “closed without relief” complaints and “closed with explanation” complaints.

The “in progress” label is used when a company indicates that it needs more than the standard 15 calendar days to respond to a complaint, giving the company up to 60 calendar days to respond.⁴⁰ The “untimely response” label is used when a response to the complaint is provided beyond the 15 or 60 day timeframe.⁴¹

The “closed” label was used for complaints that were closed without relief or an explanation and was discontinued in April 2017.⁴²

End Notes

¹ Consumer Financial Protection Bureau, *We're the CFPB*, accessed at <https://www.consumerfinance.gov>, 25 April 2019.

² Ibid.

³ The CFPB cites a higher number of total complaints received. However, the CFPB's online complaint database only publishes complaints that involve financial products within the CFPB's jurisdiction, are submitted by consumers with proven commercial relationships with the identified companies, are not duplicate complaints, and are not whistleblower complaints. See Bureau of Consumer Financial Protection, *Disclosure of Consumer Complaint Data*, 25 March 2013.

⁴ We analyzed data posted in the database from December 1st, 2011, when the CFPB began collecting complaints, to January 14th, 2019, when we downloaded the data. See the methodology section of this report.

⁵ Navient was created to service federal student loans once serviced by Sallie Mae. While Sallie Mae now focuses on private loans, Navient services federal student loans. See Sallie Mae, *Sallie Mae Board Approves Strategic Separation of Navient Corporation, Sets Record Date and Distribution Date* (press release), 10 April 2014.

⁶ Equifax is the most complained about company in 25 states and the District of Columbia.

⁷ The loss of Social Security numbers and birthdates puts consumers at risk of identity theft and other types of fraud for the rest of their lives, as this information cannot be changed like a credit card number. For more information, see the U.S. PIRG report on the Equifax data breach:

Mike Litt, U.S. PIRG Education Fund, *Equifax Breach: One Year Later*, 6 September 2018.

⁸ The Dodd-Frank Act of 2010 gave the CFPB enforcement, rulemaking, and supervisory authority over the national consumer reporting agencies for compliance with the Fair Credit Reporting Act (FCRA). Consumer rights under the FCRA include the right to dispute errors on credit reports, to receive a free annual report from each bureau, and to place free credit freezes.

⁹ The CFPB created the "credit reporting, credit repair services, or other personal consumer reports" product category on April 22nd, 2017. Previously, the product label was "credit reporting," while "credit repair" was part of "other financial services." We therefore combined complaints with those three labels for the purpose of this report's analysis. For further explanation of how labels changed in the database and were combined for this report, see the methodology section of this report.

¹⁰ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2019.

¹¹ Company response labels changed in the database over time. See the methodology section of this report for an explanation of which company response labels we combined for this table and what the labels mean.

¹² The most common credit reporting issue is "incorrect information on your report," which can be resolved non-monetarily by correcting mistakes on reports. See Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2019.

¹³ U.S. PIRG has not determined the reason for Experian's better relief rates as compared to their competitors, Equifax and TransUnion.

¹⁴ Federal Trade Commission, *In FTC Study, Five Percent of Consumers Had Errors on Their Credit Reports That Could Result in Less Favorable Terms for Loans* (press release), 11 February 2013.

¹⁵ Consumer Financial Protection Bureau, *CFPB Sues Nation's Largest Student Loan Company Navient for Failing Borrowers at Every Stage of Repayment* (press release), 18 January 2017.

¹⁶ Ben Lane, "Ocwen Settles with Massachusetts over Alleged 'Widespread' Mortgage Servicing Issues," *Housingwire*, 29 March 2019.

¹⁷ Product category labels changed in April 2017. There are currently nine products to choose from on the CFPB complaint form. For more information on the labels that have changed, see the methodology section of this report.

¹⁸ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2018.

¹⁹ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2019.

²⁰ For an explanation of these and other causes of credit reporting errors, see Chi Chi Wu, *Testimony before the U.S. House of Representatives Committee on Financial Services*, 26 February 2019.

²¹ *Ibid.*

²² In fact, a 2019 report shows that credit bureaus are biased against consumers in cases of a dispute. Credit bureaus take part in “parroting,” or adopting furnisher responses without reviewing the case themselves. See Chi Chi Wu, Michael Best, and Sarah Bolling Mancini, National Consumer Law Center, *Automated Injustice Redux*, February 2019.

²³ United States Department of Justice, *Federal Government and State Attorneys General Reach \$25 Billion Agreement with Five Largest Mortgage Servicers to Address Mortgage Loan Servicing and Foreclosure Abuses* (press release), 9 February 2012.

²⁴ Mike Litt and Edmund Mierzewski, U.S. PIRG Education Fund, *Mortgages and Mortgage Complaints*, July 2015.

²⁵ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2016.

²⁶ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2018.

²⁷ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2019.

²⁸ The ten most complained about debt collection companies accounted for 50,341 complaints out of the 229,603 total debt collection complaints.

²⁹ The CFPB's larger participant debt collection rule was estimated to apply to about 175 out of the 4,500 debt collection companies in the marketplace, which could also be an indication that this industry is not as concentrated as others. See Bureau of Consumer Financial Protection, *Defining Larger Participants of the Consumer Debt Collection Market*, 31 October 2012.

³⁰ Bureau of Consumer Financial Protection, *Consumer Financial Protection Bureau Releases Report on 2018 Administration of the Fair Debt Collection Practices Act* (press release), 20 March 2019.

³¹ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2018.

³² See the methodology section of this report for how we normalized the data to account for state population size.

³³ The CFPB has received more than 1.5 million complaints, but as of January 2019 it had published just under 1.2 million.

³⁴ Bureau of Consumer Financial Protection, *Disclosure of Consumer Complaint Data*, 25 March 2013.

³⁵ United States Census Bureau, *2018 National and State Population Estimates*, 19 December 2018, available at <https://www.census.gov/newsroom/press-kits/2018/pop-estimates-national-state.html>.

³⁶ Consumer Financial Protection Bureau, *Consumer Response Annual Report*, 31 March 2012.

³⁷ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2019.

³⁸ Consumer Financial Protection Bureau, *Consumer Response Annual Report*, 31 March 2012.

³⁹ Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2019.

⁴⁰ *Ibid.*

⁴¹ *Ibid.*

⁴² Bureau of Consumer Financial Protection, *Consumer Response Annual Report*, March 2018.