

October 18, 2018

Chairman Joseph J. Simons
Commissioner Rohit Chopra
Commissioner Noah Joshua Phillips
Commissioner Rebecca Kelly Slaughter
Commissioner Christine S. Wilson
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Acting Director Mick Mulvaney
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

Dear Chairman Simons; Commissioners Chopra, Phillips, Slaughter, and Wilson; and Acting Director Mulvaney:

The undersigned organizations write to encourage the Federal Trade Commission (FTC) and the Consumer Financial Protection Bureau (CFPB) to investigate a security flaw with Experian's website, first reported by [Nerdwallet](#) on October 4th, 2018.¹

Experian's website allows consumers to retrieve their credit freeze PIN, which is needed to temporarily remove a freeze when applying for credit, if they lost it. However, PINs could be retrieved by simply answering "none of the above" to all security questions, providing an opportunity for identity thieves to retrieve PINs, remove freezes, and apply for new credit accounts. This puts all consumers with an Experian credit freeze at risk, including deployed servicemembers who might not discover any fraud until after they return.

The security flaw appears to be fixed, but Experian still has not notified consumers of the risk or told them how to protect themselves. Consumer advocates encourage people with Experian credit freezes to check their Experian credit reports for fraudulent accounts and suspicious inquiries. Consumers should also [change their credit freeze PINs](#).²

At the very least, Experian should notify all who may be at risk because their PINs were retrieved before the flaw was fixed.

¹ Liz Weston, "[Experian Flaw Just Revealed PINs Protecting Credit Data](#)," *Nerdwallet*, 4 October 2018.

² U.S. PIRG, *Update to How You Can [Change Your Experian Credit Freeze PIN](#)*, 16 October 2018.

Letter from State and National Organizations to FTC and CFPB Re Experian 18 October 2018

It is essential that Experian takes this security issue seriously because credit freezes remain the best line of defense consumers have against new account identity theft. Consumers should be able to control access to their own credit reports securely, and the credit bureaus must ensure such security.

We urge the FTC and CFPB to investigate the security flaw and levy robust financial penalties where appropriate based on the results of the investigation.

Thank you for your attention on this important matter. If you have any questions, please feel free to contact Ed Mierzwinski at edm@pirg.org or 202-461-3821.

Sincerely,

National Organizations

Allied Progress

Americans for Financial Reform

Center for Digital Democracy

Center for Global Policy Solutions

Consumer Action

Consumer Federation of America

Consumer Watchdog

Consumers for Auto Reliability and Safety

Consumers Union

Equal Voice Action

Franciscan Action Network

Main Street Alliance

NAACP

National Association of Consumer Advocates

National Consumer Law Center (on behalf of its low-income clients)

National Consumers League

National Military Family Association

National Rural Social Work Caucus

Privacy Rights Clearinghouse

Privacy Times

Public Knowledge

Revolving Door Project

U.S. PIRG

Woodstock Institute

State Organizations

Advocacy for Principled Action in Government

AkPIRG

Asian Services In Action

CASH Campaign of Maryland

Center for Changing Lives

Constitutional Alliance

Delaware Community Reinvestment Action Council, Inc.

Florida Consumer Action Network

Georgia Watch

Interfaith Worker Justice - New Mexico

Manufactured Home Owners Association of New Jersey

Maryland Consumer Rights Coalition

Missouri Faith Voices A Faith in Action Federation

National Association of Social Workers, West Virginia Chapter

New Jersey Citizen Action

Northwest Side Housing Center (NWSHC) - Illinois

Progress Florida

Prosperity Works

Tennessee Citizen Action

Texas Appleseed

THE ONE LESS FOUNDATION

Tzedek DC

Vermont Public Interest Research Group

Virginia Citizens Consumer Council

WV Citizen Action Group