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.

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

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