



3138 10th Street North
Arlington, VA 22201-2149
703.522.4770 | 800.336.4644
f: 703.524.1082
nafcu@nafcu.org | nafcu.org

National Association of Federally-Insured Credit Unions

September 15, 2017

Hon. Maureen K. Ohlhausen
Acting Chairman
Federal Trade Commission
600 Pennsylvania Ave, NW
Washington, DC 20580

Hon. Terrell McSweeney
Commissioner
Federal Trade Commission
600 Pennsylvania Ave, NW
Washington, DC 20580

RE: Equifax Data Breach

Dear Acting Chairman Ohlhausen and Commissioner McSweeney:

On behalf of the National Association of Federally-Insured Credit Unions (NAFCU), the only national trade association focusing exclusively on federal issues affecting the nation's federally insured credit unions, I am writing to you regarding the Equifax data breach, first reported on September 7, 2017. According to early analysis, as many as 150 million Americans may have been affected by this incident, possibly exposing Social Security numbers, birth dates, and other personal information and financial records.

Since the breach was first reported, NAFCU has heard that many credit union members are distressed and turning to their credit unions to learn whether Equifax's breach has exposed their data, what ramifications this poses, and what they can do to mitigate any further loss.

From NAFCU's understanding, it is not yet clear whether the full scope of the breach has been identified by Equifax, and there are conflicting reports questioning the accuracy of Equifax's database for consumers to check whether their data has been compromised.

Credit unions want to know which accounts have been compromised so that they can help their members. While NAFCU has already reached out to Equifax to learn more about the expanse of the breach, we have also become aware that several state regulators, such as the New York Department of Financial Services, have already started communicating and sharing information with banks under their supervision.

NAFCU is aware that the FTC has formally initiated an investigation. As you conduct your investigation, we ask that you work with the National Credit Union Administration (NCUA) in sharing information that can aid credit unions as they help members deal with the breach's impact.

NAFCU is extremely dismayed by this breach, and we welcome your investigation to ensure that such an incident does not occur in the future. For our part, NAFCU has created a webpage - http://www.nafcu.org/equifax_data_breach/ - dedicated to providing credit

Federal Trade Commission

September 15, 2017

Page 2 of 2

unions and their members with informational resources and on-going developments. NAFCU would like to offer assistance in sharing any additional information and guidance that the agency has developed. Please do not hesitate to contact me at (703) 842-2234 or chunt@nafcuh.org.

Sincerely,

A handwritten signature in cursive script that reads "Carrie R. Hunt".

Carrie R. Hunt

EVP of Government Affairs & General Counsel