



WORLD **PRIVACY** FORUM

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Comments of the World Privacy Forum

to

The Consumer Financial Protection Bureau

**RE: Request for Information Regarding Bureau Public Reporting Practices of
Consumer Complaint Information, Docket No. CFPB -2018-0006**

Via Regulations.gov

Comment Intake
Consumer Financial Protection Bureau
1700 G St., N.W.
Washington, DC 20552
Bureau of Consumer Financial Protection

June 4, 2018

Dear Acting Director Mulvaney:

The World Privacy Forum appreciates the opportunity to comment on the CFPB's Request for Information regarding the consumer complaint database, Docket No. CFPB - 2018-0006. The World Privacy Forum is a non-profit public interest research group that focuses on data privacy issues, including those relating to technology, health, biometrics, and other topics. Our research, testimony, consumer education, and other materials are available on our webpage, www.worldprivacyforum.org.

We writing to express how the CFPB consumer complaint data is both unique and highly valuable in the detection and prevention of fraud and identity theft in the US. Speaking about our research and analysis work, we can unambiguously state that without access to the CFPB datasets, WPF could not have completed its work on identity theft trends; this research and analysis is crucial for law enforcement, other front-line responders, and for victims.

We urge the CFPB to maintain, at a minimum, the current level of consumer complaint reporting, and not decrease it.

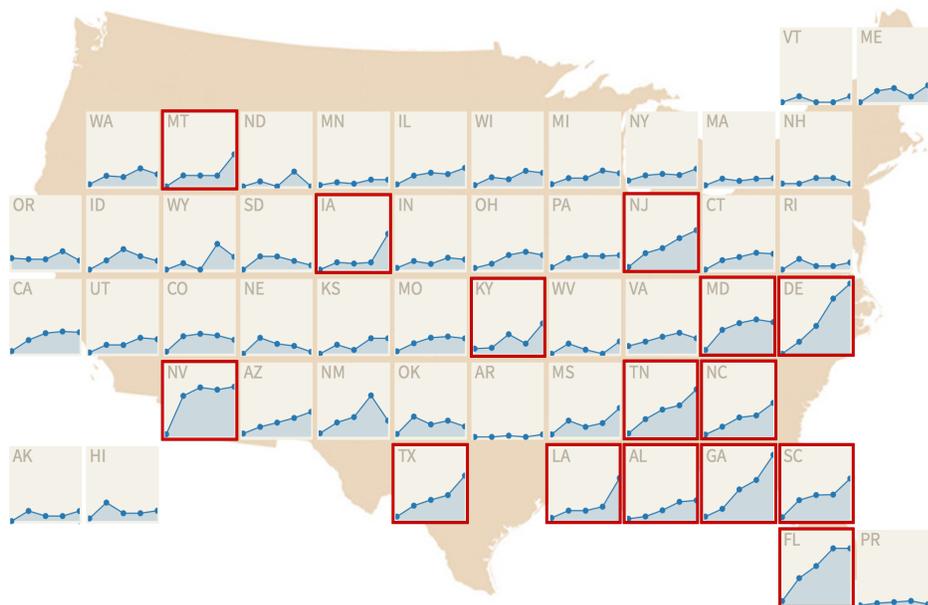
To understand how vital the CFPB database is in assisting in understanding identity theft trendlines, we would like to briefly explain how we have used the CFPB data. We have worked on identity issues for more than a decade, including medical identity theft. Our intensive work on this issue began in 2005, when WPF testified before the National Committee on Vital and Health Statistics on a then-unknown issue we called "medical identity theft." In 2006, we published the first report about the crime, *Medical Identity Theft: The information crime that can kill you*, <https://www.worldprivacyforum.org/2006/05/report-medical-identity-theft-the-information-crime-that-can-kill-you/>.

Since 2006, the crime of medical identity theft has become nationally and internationally known as a significant issue that causes substantial harm to its victims and creates losses of hundreds of millions of dollars to affected businesses and consumers. In order to continue to shed light on this crime, we use Department of Justice data, FBI data, Federal Trade Commission data, and very importantly, we have used the CFPB data in the CFPB consumer database. The CFPB data is essential for tracking a variety of consumer issues, including identity theft complaints.

Using CFPB data, we have been able to determine, for example, where the crime of medical identity theft is trending in the US over time. We presented our most recent work on this issue to the FTC during its Informational Harms workshop in December, 2017. The full report, *The Geography of Medical Identity Theft*, is located at <https://www.worldprivacyforum.org/2017/12/new-report-the-geography-of-medical-identity-theft/> for more information.

On the next page is just one screenshot of some of the data we analyzed from the CFPB database for our December report; this screenshot below reveals that 15 states in the US have current spikes in medical ID theft consumer complaint incidence. This data is essential for planning law enforcement responses to the crime, and also for understanding where to plan other victim resource efforts and dollars.

Rate per 1 Million Population, 2013-2017



*This data visualization above shows the rate of medical identity theft complaints in the US from 2013-2017. This image is excerpted from **The Geography of Medical Identity Theft**, World Privacy Forum, as presented to the Federal Trade Commission for its Informational Harms Workshop, December 2017. Data from the Consumer Financial Protection Bureau. Full report: <https://www.worldprivacyforum.org/2017/12/new-report-the-geography-of-medical-identity-theft/>.*

The data we use from the CFPB database is not personally identifiable, and it is of extraordinary public interest and value. It is one of the most important modern consumer complaint datasets, if not the most important. Without it, we cannot track medical identity theft complaints as effectively. This is crucial work. As we wrote in 2005, medical identity theft is a crime that brings extraordinary harms to its victims, and it is a crime that likes to hide. The complaints in the CFPB database help reveal the patterns of identity theft crimes much more quickly than would otherwise be possible.

We have made great strides in improving medical identity theft problems, but the crime of medical identity theft is still on the rise and still hides and still brings harms to its victims. The CFPB consumer complaint database has shed important new light on identity theft issues and trends. We ask that CFPB continue forward with its important database, and allow researchers and others to continue to access consumer complaint data and use it to document and track issues of vital consumer interest.

We note, too, that the database is managed in a responsible way -- we neither receive nor see identifiable consumer data, something that is important to us as privacy experts. At the same time, we do have the ability to broadly regionalize data so we can see the ways that identity theft trendlines are moving and changing over time.

We urge you to keep the CFPB consumer database open for business and available as the vital public resource that it is. If you have any questions, please contact Pam Dixon at +1 760-470-2000.

Thank you,
Respectfully submitted,

A handwritten signature in cursive script that reads "Pam Dixon".

Pam Dixon
Executive Director
World Privacy Forum
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