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# Responsibilities and Roles

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## RESPONSIBILITIES

Credit reporting information is sensitive data. The issues of accuracy and completeness of information and fairness to consumers are not just a concern of the consumer reporting agencies; credit grantor participation is also required. Federal and state laws already regulate certain aspects of credit reporting. In order to protect your ability to conduct business without the further intervention of external forces, you must participate in the accuracy process.

Both credit grantors and consumers depend on consumer reporting agencies to acquire and maintain accurate credit histories. This can only be accomplished if the provider of consumer data understands the tools that are available and adheres to the standards for credit reporting.

The purpose of this guide is to document this very important process and includes:

- Industry Standards
- Metro 2 Format
- Metro 2 Implementation Checklist
- Automated Universal Data Process
- Automated Consumer Dispute Verification

The Metro 2 Format Task Force strongly encourages you to make the fullest use of the tools and procedures outlined in this guide, and to contact the consumer reporting agencies at any time for whatever assistance you may need.

# Responsibilities and Roles

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## ROLES

### **Consumer Data Industry Association (CDIA)**

An international trade association representing the consumer credit, mortgage reporting, employment and tenant screening and collection service industries. Headquartered in Washington, DC, CDIA provides legislative assistance and a lobbying function to its members, and works with the consumer reporting agencies to establish standards for the consumer reporting industry.

For more information about CDIA, visit their website at [www.cdiaonline.org](http://www.cdiaonline.org).

### **Consumer Reporting Agencies**

Individual companies that collect, store, maintain and distribute information on consumer credit history.

For more information about the agencies, visit their websites at:

[www.equifax.com](http://www.equifax.com)  
[www.experian.com](http://www.experian.com)  
[www.innovis.com](http://www.innovis.com)  
[www.transunion.com](http://www.transunion.com)

### **Metro 2 Format Task Force**

Despite the competitive and organizational barriers within the credit industry, the consumer reporting agencies continue to work together to develop, maintain and enhance an industry-standard reporting format. The task force's mission is to provide a standardized method for the reporting of accurate, complete and timely data.

The Metro 2 Format Task Force is comprised of representatives from Equifax, Experian, Innovis and TransUnion and is supported by the CDIA.

For information specific to data reporting, click on the Metro 2 option at [www.cdiaonline.org](http://www.cdiaonline.org).

# Responsibilities and Roles

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## **E-OSCAR System Support Team**

This group maintains an industry-wide automated consumer dispute resolution system, which is required by the Fair Credit Reporting Act (FCRA) section 611 (a) (5) (D). This team also meets through the auspices of CDIA and includes representatives from Equifax, Experian, Innovis and TransUnion.

For information specific to consumer disputes, click on the E-OSCAR option at [www.cdiaonline.org](http://www.cdiaonline.org).

## **Data Furnisher**

Company who provides consumer credit accounts receivables to one or more consumer reporting agency.

Duties of furnishers are described in FCRA (section 623). See <http://www.ftc.gov/os/statutes/fcra.pdf> for additional information.

## **Federal Trade Commission (FTC)**

Under the FCRA (section 621), the FTC is charged with enforcing and interpreting the Fair Credit Reporting Act. As such, they issue staff opinion letters, press releases and consumer educational materials. More information can be found on the Internet at <http://www.ftc.gov/os/statutes/fcrajump.htm>.

# Automated Data Reporting

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## ADVANTAGES OF THE METRO 2 FORMAT

- Accepted by all consumer reporting agencies, the Metro 2 Format enables the reporting of accurate, complete and timely credit information.
- Meets all requirements of the Fair Credit Billing Act (FCBA), the Fair Credit Reporting Act (FCRA), the Equal Credit Opportunity Act (ECOA) and all applicable state laws.
- When all data fields are used accurately and reported each month, compliance with legislation is ensured.
- Allows credit information to be added and mapped to the consumer's file with greater consistency.
- Allows complete identification information to be reported for each consumer (including co-debtor, co-signer, etc.) each month which improves the ability of the consumer reporting systems to match to the correct consumer.
- Accommodates cycle reporting of data, which allows more timely updating of the credit file.
- Accommodates additional information not provided in other formats used for reporting credit information:
  - Full four digit year
  - New data elements
  - Consumer-specific ties
  - Expanded functionality
- The Payment History Profile (up to 24 months) makes it possible for the credit grantor to supply automated updates/corrections for the file rather than costly manual updates/corrections, and reduces consumer disputes.

# Automated Data Reporting

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- Flexibility of the format provides for future enhancements.

Reporting in the Metro 2 Format greatly benefits the credit grantor, the consumer reporting agencies and your customer, the consumer.

## INDUSTRY REPORTING STANDARDS

An industry standard for reporting consumer accounts will ensure the integrity and consistency of the credit information being reported.

- All accounts must be reported on a monthly basis.
- A final Account Status Code must be reported when the accounts are ultimately paid or closed.
- If reporting by cycles, all accounts must be reported at the close of each cycle.
- When reporting delinquent accounts, the "Industry Standard for Reporting Account Delinquency" must be followed.

## INDUSTRY STANDARD FOR REPORTING ACCOUNT DELINQUENCY

The "clock" for a 30-day delinquency starts 30 days after the **due date**, as opposed to the billing date.

The following example tracks an account history for four months, specifying the Metro 2 Account Status Code that should be reported.

<b>Billing Dates</b>	<b>Jan. 1</b>	<b>Feb. 1</b>	<b>Mar. 1</b>	<b>Apr. 1</b>
Bills Received	1	2	3	4
Payments Past Due	0	1	2	3
Age from Due Date	0	1	31	61
Age from Billing Date	0	30	60	90
Metro 2 Status Code	11	11	71	78

### Definitions:

Metro 2 Status Code 11	0 – 29 days past due date
Metro 2 Status Code 71	30 – 59 days past due date
Metro 2 Status Code 78	60 – 89 days past due date

# Automated Data Reporting

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## MAINTAINING INTEGRITY AND CONSISTENCY OF CREDIT INFORMATION

Once information is reported accurately, it is important that data furnishers not ask for a subsequent change in the history payment record unless the payment history is inaccurate.

- Consumer credit history information will be reported in a factual, precise and objective manner.
- Only inaccurately reported accounts should be deleted. Paid derogatory accounts, such as collections or charge offs, should be reported as paid; they should not be deleted.
- Requests by consumers for reverification of challenged information must be processed promptly.
- Unless an error is discovered, the consumer will be advised that the factual credit history will continue to be reported.

***Asking for exceptions to the standards jeopardizes the integrity of the data.***

## Quick Reference Guide to Accurate Industry Standards

### Banking / Savings & Loan / Credit Union / Loan Finance - Installment Loan & Line of Credit

Requirements specific to Installment Loans and Lines of Credit are defined below.

**Important Note:** Refer to Credit Cards (non-Retail), Student Loans and Mortgages for requirements specific to reporting those types of accounts.

Field	Segment/ Field #		
Portfolio Type	Base/8	I (Installment)	C (Line of Credit)
Account Type	Base/9	00 – 05, 10, 11, 13, 17, 20, 22, 23, 90, 91, 0A, 3A, 6A, 9A, 7B, 1C, 6D, 0F	15, 43, 47, 7A, 8B, 9B
Credit Limit	Base/11	Zero fill	Assigned credit limit
Highest Credit/Original Loan Amount	Base/12	Original amount of the loan, excluding interest payments	Highest balance ever attained
Terms Duration	Base/13	Number of months of the loan	Constant of 'LOC'
Scheduled Monthly Payment Amount	Base/15	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	Base/17A	05, 11, 13, 61 – 65, 71, 78, 80, 82 – 84, 89, 93 – 97, DA, DF	05, 11, 13, 62, 64, 71, 78, 80, 82 – 84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = I Leasing = BB – BK, BS (Require Account Type Code 13 or 3A) Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AG, AI, AJ, AO, AU, AX, BN, BP, BT Transferred = H, O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank	Closed accounts = M, AP Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, AX, BP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code '3' (Authorized User) is not applicable.	ECOA Code '3' (Authorized User) is not applicable.

## Child Support Agencies

Requirements specific to reporting Child Support Agencies are defined below.

Field	Segment/ Field #	
Portfolio Type	Base/8	O (Open)
Account Type	Base/9	50, 93
Date Opened	Base/10	Date the case was initiated with the state agency
Highest Credit/Original Loan Amount	Base/12	Zero fill
Current Balance	Base/21	Total amount due from outstanding support payments. This amount must equal, at a minimum, one scheduled monthly payment amount.
Scheduled Monthly Payment Amount	Base/15	The monthly debt obligation
Account Status	Base/17A	Able to Age Account History: 05, 11, 13, 62, 71, 78, 80, 82 – 84, 93, DA Unable to Age Account History: 05, 11, 13, 62, 93, DA
FCRA Compliance / Date of First Delinquency	Base/25	Activity Date – because each month begins a new obligation. Note: This date must freeze when the child or youngest child, in the case of multiple children, reaches the age of majority or emancipation, or the statute of limitations in that state has been reached.
Special Comment	Base/19	Code 'CS' is used to overlay the Date of First Delinquency each month when reporting delinquent and collection account statuses because each month begins a new obligation. Other applicable comments are: Legal Action = AM Special Payment Arrangements = B, AC, AI, AJ Transferred = O, AT Other = S, V, AW Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XH, XR
ECOA Code	Base/37 J1 & J2/10	1 (Individual)
Consumer Information Indicator	Base/38 J1 & J2/11	T and U only (Note: Bankruptcy, Personal Receivership and Reaffirmation of Debt codes are not applicable.)

## Collection Agencies/Debt Purchasers

Requirements specific to reporting Collection Agency and Debt Purchaser accounts are defined below.

Field	Segment/ Field #	Collection Agency/Debt Purchaser	Returned Checks
Portfolio Type	Base/8	O (Open)	O (Open)
Account Type	Base/9	48, 0C	77
Date Opened	Base/10	Date the account was placed/assigned to the third party collection agency or purchased by the debt purchaser	Date of the check
Terms Frequency	Base/14	Blank fill	Blank fill
Account Status	Base/17A	62, 93, DA, DF (Note: Paid in full collection accounts must not be deleted.)	62, 93, DA, DF (Note: Paid in full collection accounts must not be deleted.)
FCRA Compliance / Date of First Delinquency	Base/25	Refer to Metro 2 Format guide.	Date the check was returned for non-sufficient funds. If not available, the date of the check is acceptable.
Special Comment	Base/19	Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, BP Other = S, V, AW Removal of comment = blank	Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, BP Other = S, V, AW Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XB, XC, XF, XG, XH, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Codes 0 and 3 are not applicable.	ECOA Codes 0, 3, 5 and 7 are not applicable.
K1 Segment	K1/2	Original credit grantor's name	Original Creditor = Name of the payee
	K1/3	Creditor Classification = 02 (for medical debts)	Creditor Classification = 02 (for medical debts)

## Credit Cards – Banks, Credit Unions, Travel & Entertainment (non-Retail Cards)

Requirements specific to reporting Credit Cards are defined below.

Field	Segment/ Field #		
Portfolio Type	Base/8	R (Revolving)	O (Open)
Account Type	Base/9	18, 37, 2A, 8A, 0G	18, 37, 2A, 8A
Credit Limit	Base/11	Assigned credit limit	Zero fill
Highest Credit/Original Loan Amount	Base/12	Highest balance ever attained	Highest balance ever attained
Terms Duration	Base/13	'REV' (for revolving payments)	'001' (for one payment due as scheduled)
Scheduled Monthly Payment Amount	Base/15	Minimum amount due based on the balance, not including any amounts past due	Zero fill
Account Status	Base/17A	05, 11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF	05, 11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = M, AP, BL Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, AX, BP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH Removal of comment = blank	Closed accounts = M, AP, BL Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, BP Transferred = AT, O, AH, AN, BA Other = S, V, AV, AW, CH Removal of comment = blank
ECOA Code	Base/37 J1 & J2/10	ECOA Codes 5 and 7 are not applicable.	ECOA Codes 5 and 7 are not applicable.

## Mortgage Loans

Requirements specific to Mortgages are defined below.

Field	#			
Portfolio Type	8	M (Mortgage)	I (Installment)	C (Line of Credit)
Account Type	9	19, 25, 26, 5A, 5B, 6B, 2C, 08	04, 05, 17, 0A, 9A, 6D, 0F	89
Credit Limit	11	Zero fill	Zero fill	Assigned credit limit
Highest Credit/Original Loan Amount	12	Original amount of the loan, excluding interest payments	Original amount of the loan, excluding interest payments	Highest balance ever attained
Terms Duration	13	Number of years of the loan	Number of months of the loan	Constant of 'LOC'
Scheduled Monthly Payment Amount	15	Regular monthly payment, including principal, interest & escrow	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	17A	05, 11, 13, 65, 71, 78, 80, 82-84, 89, 94, DA, DF	05, 11, 13, 62, 64, 65, 71, 78, 80, 82-84, 89, 93, 94, 97, DA, DF	05, 11, 13, 62, 64, 65, 71, 78, 80, 82-84, 89, 93, 94, 97, DA, DF
Special Comment (optional field)	19	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, BP Transferred = AT, H, O, AH, AN, BA Other = S, V, AV, AW, BO, CH Removal of comment = blank	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AG, AI, AJ, AU, AX, BN, BP, BT Transferred = AT, H, O, AH, AN, BA Other = S, V, AV, AW, BO, CH Removal of comment = blank	Closed accounts = M, AP Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, BP Transferred = AT, O, AH, AN, BA Other = S, V, AV, AW, BO, CH Removal of comment = blank
Compliance Condition Code	20	XB, XC, XF, XG, XH, XR	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	37 J1/J2-10	ECOA Code '3' (Authorized User) is not applicable.	ECOA Code '3' (Authorized User) is not applicable.	ECOA Code '3' (Authorized User) is not applicable.
K3 Segment Mortgage Information	2 3	Agency Identifier = 01 (Fannie Mae) & 02 (Freddie Mac) Secondary Agency Account Number	Segment not applicable	Segment not applicable

## Retail Accounts (store exclusive)

Requirements specific to Retail accounts are defined below.

Field	Segment/ Field #		
Portfolio Type	Base/8	R (Revolving)	I (Installment)
Account Type	Base/9	07	06
Credit Limit	Base/11	Assigned credit limit	Zero fill
Highest Credit/Original Loan Amount	Base/12	Highest balance ever attained	Original amount of the loan, excluding interest payments
Terms Duration	Base/13	Constant of 'REV'	Number of months of the loan
Scheduled Monthly Payment Amount	Base/15	Minimum amount due based on the balance, not including any amounts past due	Regular monthly payment
Account Status	Base/17A	05, 11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF	05, 11, 13, 61 - 64, 71, 78, 80, 82-84, 93, 95 - 97, DA, DF
Special Comment	Base/19	Closed accounts = M, AP, BL Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AO, AU, AX, BP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank	Closed accounts = I Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AO, AU, AX, BP, BT Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank
Compliance Condition Code	Base/20	XA – XJ, XR	XB, XC, XF, XG, XH, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Codes 5 and 7 are not applicable.	ECOA Code 3 is not applicable.

## Sales Finance

Requirements specific to reporting the Sales Finance industry are defined below.

Field	Segment/ Field #		
Portfolio Type	Base/8	I (Installment Loan)	R (Revolving)
Account Type	Base/9	00 – 03, 06, 11, 13, 17, 3A, 7B	07
Credit Limit	Base/11	Zero fill	Assigned Credit Limit
Highest Credit/Original Loan Amount	Base/12	Original amount of the loan, excluding interest payments	Highest balance ever attained
Terms Duration	Base/13	Number of months of the loan	'REV' (for revolving payments)
Scheduled Monthly Payment Amount	Base/15	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due
Account Status	Base/17A	05, 11, 13, 61 – 64, 71, 78, 80, 82 – 84, 93, 95 – 97, DA, DF	05, 11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = I Leasing = BB – BK, BS (Require Account Type Code 13 or 3A) Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AJ, AO, AU, AX, BN, BP, BT Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank	Closed accounts = M, AP, BL Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AO, AU, AX, BP Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code 3 is not applicable.	ECOA Codes 5 and 7 are not applicable.

## Student Loan Reporters

Requirements specific to reporting Student Loans are defined below.

Field	Segment/ Field #	Lender/Servicer/Secondary Market	Guaranty Agency / US Dept. of Education
Portfolio Type	Base/8	I (Installment Loan)	O (Open)
Account Type	Base/9	12	12
Date Opened	Base/10	Date the account was originally opened	Date the claim was paid to the lender
Terms Duration	Base/13	Number of months of the loan	'001' (for one payment due as scheduled)
Terms Frequency	Base/14	M (monthly) or D (deferred)	Blank fill
Account Status	Base/17A	05, 11, 13, 71, 78, 80, 82 – 84, 88, DA, DF	62, 93, DA, DF
Special Comment	Base/19	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, BP, BT Transferred = O, AH, AL, AN, AT Other = S, V, AV, AW, CH Removal of comment = blank	Legal Action = AM Special Payment Arrangements = B, C, AC, AI, AJ, AU Other = S, V, AV, AW, CH Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XB, XC, XF, XG, XH, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code 3 is not applicable.	ECOA Code 3 is not applicable.
K1 Segment	K1/2	Segment not applicable	Complete name of the lender to whom the claim was paid
K4 Segment	K4/2	Specialized Payment Indicator = 02	Segment not applicable
	K4/3	Deferred Payment Start Date = date the first payment is due for deferred loans	

## Utility Companies

Requirements specific to Utility Companies are defined below.

Field	Segment/ Field #		
Portfolio Type	Base/8	I (Installment)	O (Open)
Account Type	Base/9	06	92, 4D
Highest Credit/Original Loan Amount	Base/12	Original amount of the loan, excluding interest payments	Highest balance ever attained
Terms Duration	Base/13	Number of months of the loan	'001' (for one payment due as scheduled)
Scheduled Monthly Payment Amount	Base/15	Regular monthly payment	Zero fill
Account Status	Base/17A	05, 11, 13, 61 – 64, 71, 78, 80, 82 – 84, 93, 95 – 97, DA, DF	05, 11, 13, 62, 64, 71, 78, 80, 82 – 84, 93, 97, DA, DF
Special Comment	Base/19	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AJ, AO, AU, AX, BN, BP, BT Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank	Closed = M Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AJ, AU, BP Transferred = O, AH, AT, BA Other = S, V, AV, AW, CH Removal of comment = blank
Compliance Condition Code	Base/20	XB, XC, XF, XG, XH, XR	XA – XJ, XR
ECOA Code	Base/37 J1 & J2/10	ECOA Code 3 is not applicable.	ECOA Code 3 is not applicable.

# Business Requirements

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The Metro 2 Format was developed as a standard for the credit reporting industry and accomplishes the following:

- Provides one standard computer layout to be used for reporting accurate, complete and timely consumer credit information.
- Meets all requirements of the Fair Credit Reporting Act (FCRA), the Fair Credit Billing Act (FCBA) and the Equal Credit Opportunity Act (ECOA).
- Allows for reporting information at both the account and consumer levels.
- Allows for reporting the full four-digit year.

The Metro 2 Format was designed to allow reporting of the most accurate and complete information on consumers' credit history. It is imperative that all accounts are reported on a monthly basis and that they are reported with a final Account Status Code when they are ultimately paid or closed.

For data furnishers or processors who report data by cycles, all accounts should be reported at the close of each cycle.

All fields should be reported in order to comply with the FCRA, which specifies the reporting of complete and accurate information.

# Business Requirements

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The FCRA places significant responsibility on **both** the data furnishers and Consumer Reporting Agencies. For more details, refer to the FCRA (sections 621 and 623), which can be found at [www.cdiaonline.org](http://www.cdiaonline.org).

The following fields within the Metro 2 Format will assist you in complying with federal and state legislation:

- Compliance Condition Code
- Date of First Delinquency
- Account Type
- Consumer Information Indicator
- ECOA Code
- Associated borrower information (J1/J2 Segments)
- Original Creditor Name and Creditor Classification (K1 Segment)

Work closely with your compliance officers and programmers to ensure that these and all fields are reported accurately and are logical in relationship to each other.

## RETURN ON INVESTMENT

The correct use of the Metro 2 Format helps to ensure:

- Better credit granting decisions
- Reduced manual corrections
- Compliance with legislative requirements
- Reduced need for new legislation
- Reduced legal expenses
- Reduced consumer inquiries
- Reduced consumer disputes

# Programming Standards

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## CHARACTER VS. PACKED FORMAT

The Consumer Data Record consists of the Base Segment and additional segments that may be appended, as appropriate. The Header Record, Base Segment and Trailer Record are available in both unpacked and packed formats. All appendages are unpacked.

Each submission of data should contain only one occurrence of each account number.

### Character Format (preferred)

Record Size	426 alphanumeric characters (or bytes)
Format	Fixed or variable blocked

### Packed Format

Record Size	366 bytes, packed and unpacked data
Format	Variable blocked

### General Information

Block Size	Maximum of 32,760 bytes
Internal Labels	Standard (IBM) preferred
External Labels	Identifying label supplied by each consumer reporting agency
Record Layout	426 or 366 Base Segment followed by Appendages in proper sequence. For example: Base + J1 + J2 + L1

**Note:** The Character Format is preferred for data that is submitted through electronic transmission.

# Programming Standards

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## Reporting Standards

- Every alphanumeric field is left-justified and blank filled.
- Every alpha field should be upper case letters.
- Every numeric field is right-justified and zero filled.
- If a descriptive field is not available, it should be blank filled.
- If a numeric field is not available, it should be zero filled.
- If a monetary field is not applicable, it should be zero filled. Do not 9-fill these fields. A monetary field should be 9-filled when the amount is in excess of \$1 billion.
- If fixed-length records are being reported and a record does not require the information for the appendage segment, the Segment Identifier (e.g., J1) must be reported and the remainder of the segment must be blank filled.

**Any deviation from these standards jeopardizes the integrity of the data.**

**Note:** Contact each consumer reporting agency *prior* to reporting for information on:

- electronic transmission (**preferred**)
- acceptable media
- data encryption
- account number scrambling
- pre-production testing

# Production Tips

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The following tips will ensure accurate processing of your data with the consumer reporting agencies' systems:

- Use the assigned Program Identifiers in the Header Record to ensure your information is identified correctly by the consumer reporting agencies.
- Always retain a back-up copy of the data you provide. This copy could be used to replace media that was damaged or unreadable.
- Use address/zip code/social security number editing logic in your New Accounts and Customer Service systems to detect keying errors. The accuracy of consumer identification information is critical.
- Do not report derogatory accounts beyond the allowable retention periods specified by federal and state laws.
- Report data at the close of the cycles if you bill by cycles.
- Do not report business accounts.

Contact your consumer reporting agencies' representatives prior to:

- changing formats
- changing media
- implementing internal system changes that may affect the reporting of the data
- reporting account or portfolio acquisitions
- reporting account number changes
- changing data processing centers

# Record Layouts

## Header Record — Packed Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
0	Block Descriptor Word (BDW)	Y	4	1-4	B	4-1
1	Record Descriptor Word (RDW)	Y	4	1-4	B	4-1
2	Record Identifier	Y	6	5-10	AN	4-1
3	Cycle Number	A	2	11-12	AN	4-2
4	Innovis Program Identifier	A	10	13-22	AN	4-2
5	Equifax Program Identifier	A	10	23-32	AN	4-2
6	Experian Program Identifier	A	5	33-37	AN	4-2
7	TransUnion Program Identifier	A	10	38-47	AN	4-2
8	Activity Date	Y	8	48-55	N	4-2
9	Date Created	Y	8	56-63	N	4-2
10	Program Date		8	64-71	N	4-2
11	Program Revision Date		8	72-79	N	4-3
12	Reporter Name	Y	40	80-119	AN	4-3
13	Reporter Address	Y	96	120-215	AN	4-3
14	Reporter Telephone Number		10	216-225	N	4-3
15	Software Vendor Name	A	40	226-265	AN	4-3
16	Software Version Number	A	5	266-270	AN	4-3
17	Reserved		96	271-366	AN	4-3

Total 366

<sup>1</sup> Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; B = Binary; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## Header Record — Character Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
0	Block Descriptor Word (BDW)	A	4	1-4	N	4-1
1	Record Descriptor Word (RDW)	Y	4	1-4	N	4-1
2	Record Identifier	Y	6	5-10	AN	4-1
3	Cycle Number	A	2	11-12	AN	4-2
4	Innovis Program Identifier	A	10	13-22	AN	4-2
5	Equifax Program Identifier	A	10	23-32	AN	4-2
6	Experian Program Identifier	A	5	33-37	AN	4-2
7	TransUnion Program Identifier	A	10	38-47	AN	4-2
8	Activity Date	Y	8	48-55	N	4-2
9	Date Created	Y	8	56-63	N	4-2
10	Program Date		8	64-71	N	4-2
11	Program Revision Date		8	72-79	N	4-3
12	Reporter Name	Y	40	80-119	AN	4-3
13	Reporter Address	Y	96	120-215	AN	4-3
14	Reporter Telephone Number		10	216-225	N	4-3
15	Software Vendor Name	A	40	226-265	AN	4-3
16	Software Version Number	A	5	266-270	AN	4-3
17	Reserved		156	271-426	AN	4-3

Total 426

<sup>1</sup> Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## 366 Base Segment — Packed Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
0	Block Descriptor Word (BDW)	Y	4	1-4	B	4-4
1	Record Descriptor Word (RDW)	Y	4	1-4	B	4-4
2	Processing Indicator		1	5	N	4-4
3	Time Stamp		8	6-13	P	4-5
4	Correction Indicator		1	14	N	4-6
5	Identification Number	Y	20	15-34	AN	4-7
6	Cycle Identifier	A	2	35-36	AN	4-7
7	Consumer Account Number	Y	30	37-66	AN	4-7
8	Portfolio Type	Y	1	67	AN	4-7
9	Account Type	Y	2	68-69	AN	4-8
10	Date Opened	Y	5	70-74	P	4-8
11	Credit Limit	A	5	75-79	P	4-8
12	Highest Credit or Original Loan Amount	Y	5	80-84	P	4-9
13	Terms Duration	Y	3	85-87	AN	4-9
14	Terms Frequency	A	1	88	AN	4-10
15	Scheduled Monthly Payment Amount	A	5	89-93	P	4-10
16	Actual Payment Amount	A	5	94-98	P	4-10
17A	Account Status	Y	2	99-100	AN	4-11
17B	Payment Rating	A	1	101	AN	4-11
18	Payment History Profile	Y	24	102-125	AN	4-12
19	Special Comment		2	126-127	AN	4-13
20	Compliance Condition Code	A	2	128-129	AN	4-14
21	Current Balance	Y	5	130-134	P	4-15
22	Amount Past Due	A	5	135-139	P	4-15

<sup>1</sup> Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; B = Binary; N = Numeric; P = Packed

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## 366 Base Segment — Packed Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
23	Original Charge-off Amount	A	5	140-144	P	4-15
24	Date of Account Information	Y	5	145-149	P	4-16
25	FCRA Compliance/Date of First Delinquency	A	5	150-154	P	4-17
26	Date Closed	A	5	155-159	P	4-18
27	Date of Last Payment	A	5	160-164	P	4-18
28	Reserved		17	165-181	AN	4-18
29	Consumer Transaction Type		1	182	AN	4-18
30	Surname	Y	25	183-207	AN	4-19
31	First Name	Y	20	208-227	AN	4-19
32	Middle Name	A	20	228-247	AN	4-19
33	Generation Code	A	1	248	AN	4-19
34	Social Security Number	HR	5	249-253	P	4-20
35	Date of Birth	HR	5	254-258	P	4-20
36	Telephone Number		6	259-264	P	4-20
37	ECOA Code	Y	1	265	AN	4-21
38	Consumer Information Indicator	A	2	266-267	AN	4-22
39	Country Code		2	268-269	AN	4-22
40	First Line of Address	Y	32	270-301	AN	4-23
41	Second Line of Address	A	32	302-333	AN	4-23
42	City	Y	20	334-353	AN	4-23
43	State	Y	2	354-355	AN	4-24
44	Postal/Zip Code	Y	9	356-364	AN	4-24
45	Address Indicator		1	365	AN	4-24
46	Residence Code		1	366	AN	4-24

Total 366

<sup>1</sup> Required Fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported; HR = Highly Recommended as this field greatly enhances accuracy in matching to the correct consumer

<sup>2</sup> Recording Technique: AN = Alphanumeric; P = Packed

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## 426 Base Segment — Character Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
0	Block Descriptor Word (BDW)	A	4	1-4	N	4-4
1	Record Descriptor Word (RDW)	Y	4	1-4	N	4-4
2	Processing Indicator		1	5	N	4-4
3	Time Stamp		14	6-19	N	4-5
4	Correction Indicator		1	20	N	4-6
5	Identification Number	Y	20	21-40	AN	4-7
6	Cycle Identifier	A	2	41-42	AN	4-7
7	Consumer Account Number	Y	30	43-72	AN	4-7
8	Portfolio Type	Y	1	73	AN	4-7
9	Account Type	Y	2	74-75	AN	4-8
10	Date Opened	Y	8	76-83	N	4-8
11	Credit Limit	A	9	84-92	N	4-8
12	Highest Credit or Original Loan Amount	Y	9	93-101	N	4-9
13	Terms Duration	Y	3	102-104	AN	4-9
14	Terms Frequency	A	1	105	AN	4-10
15	Scheduled Monthly Payment Amount	A	9	106-114	N	4-10
16	Actual Payment Amount	A	9	115-123	N	4-10
17A	Account Status	Y	2	124-125	AN	4-11
17B	Payment Rating	A	1	126	AN	4-11
18	Payment History Profile	Y	24	127-150	AN	4-12
19	Special Comment		2	151-152	AN	4-13
20	Compliance Condition Code	A	2	153-154	AN	4-14
21	Current Balance	Y	9	155-163	N	4-15
22	Amount Past Due	A	9	164-172	N	4-15
23	Original Charge-off Amount	A	9	173-181	N	4-15

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## 426 Base Segment — Character Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
24	Date of Account Information	Y	8	182-189	N	4-16
25	FCRA Compliance/ Date of First Delinquency	A	8	190-197	N	4-17
26	Date Closed	A	8	198-205	N	4-18
27	Date of Last Payment	A	8	206-213	N	4-18
28	Reserved		17	214-230	AN	4-18
29	Consumer Transaction Type		1	231	AN	4-18
30	Surname	Y	25	232-256	AN	4-19
31	First Name	Y	20	257-276	AN	4-19
32	Middle Name	A	20	277-296	AN	4-19
33	Generation Code	A	1	297	AN	4-19
34	Social Security Number	HR	9	298-306	N	4-20
35	Date of Birth	HR	8	307-314	N	4-20
36	Telephone Number		10	315-324	N	4-20
37	ECOA Code	Y	1	325	AN	4-21
38	Consumer Information Indicator	A	2	326-327	AN	4-22
39	Country Code		2	328-329	AN	4-22
40	First Line of Address	Y	32	330-361	AN	4-23
41	Second Line of Address	A	32	362-393	AN	4-23
42	City	Y	20	394-413	AN	4-23
43	State	Y	2	414-415	AN	4-24
44	Postal/Zip Code	Y	9	416-424	AN	4-24
45	Address Indicator		1	425	AN	4-24
46	Residence Code		1	426	AN	4-24

Total 426

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported; HR = Highly Recommended as this field greatly enhances accuracy in matching to the correct consumer

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

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## J1 Segment

### Associated Consumer — Same Address

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-25
2	Consumer Transaction Type		1	3	AN	4-25
3	Surname	Y	25	4-28	AN	4-25
4	First Name	Y	20	29-48	AN	4-26
5	Middle Name	A	20	49-68	AN	4-26
6	Generation Code	A	1	69	AN	4-26
7	Social Security Number	HR	9	70-78	N	4-26
8	Date of Birth	HR	8	79-86	N	4-26
9	Telephone Number		10	87-96	N	4-27
10	ECOA Code	Y	1	97	AN	4-27
11	Consumer Information Indicator	A	2	98-99	AN	4-28
12	Reserved		1	100	AN	4-28

Total 100

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported; HR = Highly Recommended as this field greatly enhances accuracy in matching to the correct consumer

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## J2 Segment Associated Consumer — Different Address

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-29
2	Consumer Transaction Type		1	3	AN	4-29
3	Surname	Y	25	4-28	AN	4-29
4	First Name	Y	20	29-48	AN	4-30
5	Middle Name	A	20	49-68	AN	4-30
6	Generation Code	A	1	69	AN	4-30
7	Social Security Number	HR	9	70-78	N	4-30
8	Date of Birth	HR	8	79-86	N	4-30
9	Telephone Number		10	87-96	N	4-31
10	ECOA Code	Y	1	97	AN	4-31
11	Consumer Information Indicator	A	2	98-99	AN	4-32
12	Country Code		2	100-101	AN	4-32
13	First Line of Address	Y	32	102-133	AN	4-32
14	Second Line of Address	A	32	134-165	AN	4-33
15	City	Y	20	166-185	AN	4-33
16	State	Y	2	186-187	AN	4-33
17	Postal/Zip Code	Y	9	188-196	AN	4-33
18	Address Indicator		1	197	AN	4-33
19	Residence Code		1	198	AN	4-34
20	Reserved		2	199-200	AN	4-34

Total 200

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported; HR = Highly Recommended as this field greatly enhances accuracy in matching to the correct consumer

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

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## K1 Segment Original Creditor Name

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-35
2	Original Creditor Name	Y	30	3-32	AN	4-35
3	Creditor Classification	F	2	33-34	N	4-36

Total 34

## K2 Segment Purchased Portfolio/Sold To

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-37
2	Portfolio Indicator	Y	1	3	N	4-37
3	Purchased Portfolio or Sold To Name	Y	30	4-33	AN	4-37
4	Reserved		1	34	AN	4-37

Total 34

<sup>1</sup> Required fields: Y = Yes, Field is always required; F = Field is required when reporting medical debts.

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

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## K3 Segment Mortgage Information

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-38
2	Agency Identifier	A	2	3-4	N	4-38
3	Account Number	A	18	5-22	AN	4-38
4	Mortgage Identification Number		18	23-40	AN	4-38

Total 40

## K4 Segment Specialized Payment Information

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-39
2	Specialized Payment Indicator	Y	2	3-4	N	4-39
3	Deferred Payment Start Date	A	8	5-12	N	4-39
4	Payment Due Date	A	8	13-20	N	4-39
5	Payment Amount	A	9	21-29	N	4-39
6	Reserved		1	30	AN	4-39

Total 30

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

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## L1 Segment

### Account Number/Identification Number Change

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-40
2	Change Indicator	Y	1	3	N	4-40
3	New Consumer Account Number	A	30	4-33	AN	4-40
4	New Identification Number	A	20	34-53	AN	4-41
5	Reserved		1	54	AN	4-41

Total 54

## N1 Segment Employment

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Segment Identifier	Y	2	1-2	AN	4-42
2	Employer Name	Y	30	3-32	AN	4-42
3	First Line of Employer Address		32	33-64	AN	4-42
4	Second Line of Employer Address		32	65-96	AN	4-42
5	Employer City		20	97-116	AN	4-42
6	Employer State		2	117-118	AN	4-42
7	Employer Postal/Zip Code		9	119-127	AN	4-42
8	Occupation	A	18	128-145	AN	4-43
9	Reserved		1	146	AN	4-43

Total 146

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the account being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## Trailer Record — Packed Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Record Descriptor Word (RDW)	Y	4	1-4	B	4-44
2	Record Identifier	Y	7	5-11	AN	4-44
3	Total Base Records	Y	5	12-16	P	4-44
4	Reserved		5	17-21	AN	4-44
5	Total of Status Code DF		5	22-26	P	4-44
6	Total Associated Consumer Segments (J1)	A	5	27-31	P	4-44
7	Total Associated Consumer Segments (J2)	A	5	32-36	P	4-44
8	Block Count	Y	5	37-41	P	4-44
9	Total of Status Code DA		5	42-46	P	4-45
10	Total of Status Code 05		5	47-51	P	4-45
11	Total of Status Code 11		5	52-56	P	4-45
12	Total of Status Code 13		5	57-61	P	4-45
13	Total of Status Code 61		5	62-66	P	4-45
14	Total of Status Code 62		5	67-71	P	4-45
15	Total of Status Code 63		5	72-76	P	4-45
16	Total of Status Code 64		5	77-81	P	4-45
17	Total of Status Code 65		5	82-86	P	4-45
18	Total of Status Code 71		5	87-91	P	4-45
19	Total of Status Code 78		5	92-96	P	4-45
20	Total of Status Code 80		5	97-101	P	4-45
21	Total of Status Code 82		5	102-106	P	4-46
22	Total of Status Code 83		5	107-111	P	4-46
23	Total of Status Code 84		5	112-116	P	4-46
24	Total of Status Code 88		5	117-121	P	4-46
25	Total of Status Code 89		5	122-126	P	4-46
26	Total of Status Code 93		5	127-131	P	4-46
27	Total of Status Code 94		5	132-136	P	4-46

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; B = Binary; P = Packed

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## Trailer Record — Packed Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
28	Total of Status Code 95		5	137-141	P	4-46
29	Total of Status Code 96		5	142-146	P	4-46
30	Total of Status Code 97		5	147-151	P	4-46
31	Total of ECOA Code Z (All Segments)		5	152-156	P	4-47
32	Total Employment Segments		5	157-161	P	4-47
33	Total Original Creditor Segments		5	162-166	P	4-47
34	Total Purchased Portfolio/Sold To Segments		5	167-171	P	4-47
35	Total Mortgage Information Segments		5	172-176	P	4-47
36	Total Specialized Payment Information Segments		5	177-181	P	4-47
37	Total Change Segments		5	182-186	P	4-47
38	Total Social Security Numbers (All Segments)		5	187-191	P	4-48
39	Total Social Security Numbers (Base Segments)		5	192-196	P	4-48
40	Total Social Security Numbers (J1 Segments)		5	197-201	P	4-48
41	Total Social Security Numbers (J2 Segments)		5	202-206	P	4-48
42	Total Dates of Birth (All Segments)		5	207-211	P	4-48
43	Total Dates of Birth (Base Segments)		5	212-216	P	4-48
44	Total Dates of Birth (J1 Segments)		5	217-221	P	4-49
45	Total Dates of Birth (J2 Segments)		5	222-226	P	4-49
46	Total Telephone Numbers (All Segments)		5	227-231	P	4-49
47	Reserved		135	232-366	AN	4-49

Total  
366

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; P = Packed

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## Trailer Record — Character Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
1	Record Descriptor Word (RDW)	Y	4	1-4	N	4-44
2	Record Identifier	Y	7	5-11	AN	4-44
3	Total Base Records	Y	9	12-20	N	4-44
4	Reserved		9	21-29	AN	4-44
5	Total of Status Code DF		9	30-38	N	4-44
6	Total Associated Consumer Segments (J1)	A	9	39-47	N	4-44
7	Total Associated Consumer Segments (J2)	A	9	48-56	N	4-44
8	Block Count	Y	9	57-65	N	4-44
9	Total of Status Code DA		9	66-74	N	4-45
10	Total of Status Code 05		9	75-83	N	4-45
11	Total of Status Code 11		9	84-92	N	4-45
12	Total of Status Code 13		9	93-101	N	4-45
13	Total of Status Code 61		9	102-110	N	4-45
14	Total of Status Code 62		9	111-119	N	4-45
15	Total of Status Code 63		9	120-128	N	4-45
16	Total of Status Code 64		9	129-137	N	4-45
17	Total of Status Code 65		9	138-146	N	4-45
18	Total of Status Code 71		9	147-155	N	4-45
19	Total of Status Code 78		9	156-164	N	4-45
20	Total of Status Code 80		9	165-173	N	4-45
21	Total of Status Code 82		9	174-182	N	4-46
22	Total of Status Code 83		9	183-191	N	4-46
23	Total of Status Code 84		9	192-200	N	4-46
24	Total of Status Code 88		9	201-209	N	4-46
25	Total of Status Code 89		9	210-218	N	4-46
26	Total of Status Code 93		9	219-227	N	4-46
27	Total of Status Code 94		9	228-236	N	4-46
28	Total of Status Code 95		9	237-245	N	4-46

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Record Layouts

## Trailer Record — Character Format

FIELD	FIELD NAME	REQUIRED <sup>1</sup>	LENGTH	POSITION	RECORDING TECHNIQUE <sup>2</sup>	DESCRIPTION PAGE NUMBER <sup>3</sup>
29	Total of Status Code 96		9	246-254	N	4-46
30	Total of Status Code 97		9	255-263	N	4-46
31	Total of ECOA Code Z (All Segments)		9	264-272	N	4-47
32	Total Employment Segments		9	273-281	N	4-47
33	Total Original Creditor Segments		9	282-290	N	4-47
34	Total Purchased Portfolio/Sold To Segments		9	291-299	N	4-47
35	Total Mortgage Information Segments		9	300-308	N	4-47
36	Total Specialized Payment Information Segments		9	309-317	N	4-47
37	Total Change Segments		9	318-326	N	4-47
38	Total Social Security Numbers (All Segments)		9	327-335	N	4-48
39	Total Social Security Numbers (Base Segments)		9	336-344	N	4-48
40	Total Social Security Numbers (J1 Segments)		9	345-353	N	4-48
41	Total Social Security Numbers (J2 Segments)		9	354-362	N	4-48
42	Total Dates of Birth (All Segments)		9	363-371	N	4-48
43	Total Dates of Birth (Base Segments)		9	372-380	N	4-48
44	Total Dates of Birth (J1 Segments)		9	381-389	N	4-49
45	Total Dates of Birth (J2 Segments)		9	390-398	N	4-49
46	Total Telephone Numbers (All Segments)		9	399-407	N	4-49
47	Reserved		19	408-426	AN	4-49

Total  
426

<sup>1</sup> Required fields: Y = Yes, Field is always required; A = Field is required when applicable to the file being reported.

<sup>2</sup> Recording Technique: AN = Alphanumeric; N = Numeric

<sup>3</sup> Refer to definitions for field descriptions.

# Field Definitions

## Header Record

The Header Record must be the first record provided and includes information necessary to identify the reporter.

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
0	<p><b>Block Descriptor Word (BDW)</b></p> <p>Contains a value equal to the length of the block of data and must be reported when using the packed format or when reporting variable length records. This value includes the four bytes reserved for this field. Report the standard IBM variable record length conventions.</p> <p>*This field is not required when reporting fixed length, fixed block records.</p>	4	1-4 of each block of data	B	4	1-4 of each block of data*	N
1	<p><b>Record Descriptor Word (RDW)</b></p> <p>Contains a value equal to the length of the physical record. This value includes the four bytes reserved for this field.</p> <p>The recording technique is Binary for the 366 format and Numeric for the 426 format.</p> <p>Binary: The hexadecimal value should be in the first two bytes of the field and the last two bytes should contain binary zeros. Example: 016E0000.</p> <p>Numeric: The entire four bytes are used. Example: F0F4F2F6.</p> <p>If fixed-length records are being reported, the Header Record should be the same length as all the data records. The Header Record should be padded with blanks to fill the needed number of positions.</p>	4	1-4 of each physical record	B	4	1-4 of each physical record	N
2	<p><b>Record Identifier</b></p> <p>Contains a constant of <b>HEADER</b>, which is used to identify this record.</p>	6	5-10	AN	6	5-10	AN

# Field Definitions

## Header Record

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
3	<b>Cycle Number</b> Contains the cycle number for the information being reported, if reporting by cycles. If data contains more than one cycle, report the first cycle number found on the data.	2	11-12	AN	2	11-12	AN
4	<b>Innovis Program Identifier</b> Contains a unique identification number assigned by this consumer reporting agency.	10	13-22	AN	10	13-22	AN
5	<b>Equifax Program Identifier</b> Contains a unique identification number assigned by this consumer reporting agency.	10	23-32	AN	10	23-32	AN
6	<b>Experian Program Identifier</b> Contains a unique identification number assigned by this consumer reporting agency.	5	33-37	AN	5	33-37	AN
7	<b>TransUnion Program Identifier</b> Contains a unique identification number assigned by this consumer reporting agency.	10	38-47	AN	10	38-47	AN
8	<b>Activity Date</b> Signifies date of most recent update to balances on accounts. If accounts are updated on different dates, use most recent. Format is MMDDYYYY.	8	48-55	N	8	48-55	N
9	<b>Date Created</b> Contains the date the media was generated. Format is MMDDYYYY.	8	56-63	N	8	56-63	N
10	<b>Program Date</b> Contains the date your reporting format was developed. Format is MMDDYYYY. If the day is not available, use 01.	8	64-71	N	8	64-71	N

# Field Definitions

## Header Record

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
11	<b>Program Revision Date</b> Contains the last date your reporting format was revised. Format is MMDDYYYY. If the day is not available, use 01.	8	72-79	N	8	72-79	N
12	<b>Reporter Name</b> Contains the name of the processing company sending the data; i.e., data furnisher or processor.  If multiple Header Records are provided, the Reporter Name on the second and subsequent Headers may be repeated or blank filled.	40	80-119	AN	40	80-119	AN
13	<b>Reporter Address</b> Contains the complete mailing address of the processing company; i.e., street address, city, state and zip code.	96	120-215	AN	96	120-215	AN
14	<b>Reporter Telephone Number</b> Contains the telephone number (Area Code + number) of the company sending the data; i.e., data furnisher or processor.	10	216-225	N	10	216-225	N
15	<b>Software Vendor Name</b> Contains the name of the software vendor that provided the Metro 2 Format software.	40	226-265	AN	40	226-265	AN
16	<b>Software Version Number</b> Contains the version number of the Metro 2 Format software.	5	266-270	AN	5	266-270	AN
17	<b>Reserved</b> Blank fill.	96	271-366	AN	156	271-426	AN

# Field Definitions

## Base Segment

Two Base Segment formats are available: packed and character. The only differences between these two formats are some of the field positions, caused by differences in recording techniques.

This section describes each data element in the Base Segment, which is used to report the primary consumer's identification information and the account transactional information.

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
0	<p><b>Block Descriptor Word (BDW)</b> Contains a value equal to the length of the block of data and must be reported when using the packed format or when reporting variable length records. This value includes the four bytes reserved for this field. Report the standard IBM variable record length conventions.</p> <p>*This field is not required when reporting fixed length, fixed block records.</p>	4	1-4 of each block of data	B	4	1-4 of each block of data*	N
1	<p><b>Record Descriptor Word (RDW)</b> Contains a value equal to the length of the physical record. This value includes the four bytes reserved for this field. The length of each segment should be included in the RDW.</p> <p>For example: Base Segment = 426 J2 Segment = 200 K1 Segment = <u>34</u> RDW = 0660</p> <p>For fixed block, the RDW will remain the same for each record.</p> <p>For variable block, the RDW will change depending on the size of each record.</p>	4	1-4 of each physical record	B	4	1-4 of each physical record	N
2	<p><b>Processing Indicator</b> Report a constant of <b>1</b>.</p>	1	5	N	1	5	N

# Field Definitions

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## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
3	<p><b>Time Stamp</b> Contains date and time of actual account information update.</p> <p>Format for packed date is OMMDDYYYYHHMMSSs — where s is the sign. Format is MMDDYYYYHHMMSS for character date.</p>	8	6-13	P	14	6-19	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
4	<p><b>Correction Indicator</b> Used to replace the most recently reported update for the same reporting time period. Values available:</p> <p>0 = Not a replacement update (normal update) 1 = Replacement update (correction)</p> <ul style="list-style-type: none"> <li>• Only the records to be corrected should be reported on the media with this indicator set to <b>1</b>.</li> <li>• Do not mix normal updates (value 0) with replacement updates (value 1) on the same media.</li> <li>• Must receive corrected media prior to the next reporting period.</li> <li>• The Date of Account Information must be equal to the previously-reported Date of Account Information for matching purposes.</li> <li>• If being reported for the first time, contact the Consumer Reporting Agencies.</li> </ul> <p>Example: If data is generated on 09/01/2005 for Date of Account Information 08/30/2005, and a record is later found to contain incorrect Special Comments, a correction update can be included the next time data is reported. If the data is then generated on 09/10/2005, the corrected record must be reported using the original Date of Account Information of 08/30/2005 and the corrected Special Comment. The Correction Indicator would be set to <b>1</b>.</p>	1	14	N	1	20	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
5	<p><b>Identification Number</b> Used to uniquely identify a data furnisher. Report your internal code to identify each branch, office, and/or credit central where information is verified. This number must be unique and at least 5 digits long. Entire field should <i>never</i> be zero, blank or 9 filled.</p> <p><b>This field must be consistent on a month-to-month basis to avoid duplication of information. Notify consumer reporting agencies before adding, deleting, or changing the identifiers in this field.</b></p>	20	15-34	AN	20	21-40	AN
6	<p><b>Cycle Identifier</b> Report the internal cycle code for this account. Field is required if reporting by cycles; otherwise blank fill.</p>	2	35-36	AN	2	41-42	AN
7	<p><b>Consumer Account Number</b> Report the individual's complete and unique account number as extracted from your file. <b>Do not include embedded blanks or special characters.</b></p> <p>Account number scrambling and encryption methods for security purposes are permitted. Contact your local consumer reporting agency for information regarding the Metro 2 scrambling techniques.</p>	30	37-66	AN	30	43-72	AN
8	<p><b>Portfolio Type</b> Contains the one-character abbreviation for type of portfolio. Values available:</p> <p>C = Line of credit I = Installment M = Mortgage O = Open account R = Revolving</p> <p>Refer to the Glossary of Terms for definitions of each Portfolio Type.</p>	1	67	AN	1	73	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
9	<p><b>Account Type</b> Contains the account type code that identifies the account classification.</p> <p>Exhibit 1 provides a listing of type codes that specify industry usage, and Exhibit 2 provides a description of the type codes in numeric sequence.</p>	2	68-69	AN	2	74-75	AN
10	<p><b>Date Opened</b> Report the date the account was originally opened. Retain the original Date Opened regardless of future activity, such as transfer, refinance, lost or stolen card, etc.</p> <p>Valid Dates Opened must be reported – field cannot be zero or blank filled, nor contain a date in the future.</p> <p>For companies who report returned checks, such as collection agencies, report the date of the check.</p> <p>Format for packed date is OMMDDYYYYs — where s is the sign. Format is MMDDYYYY for character date. If the day is not available, use 01.</p>	5	70-74	P	8	76-83	N
11	<p><b>Credit Limit</b> Report the following values:</p> <p>Line of Credit = assigned credit limit                      Installment = zero fill                      Mortgage = zero fill                      Open = zero fill                      Revolving = assigned credit limit</p> <p>Report whole dollars only.</p>	5	75-79	P	9	84-92	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
12	<p><b>Highest Credit or Original Loan Amount</b> Report the following values in whole dollars only:</p> <p>Line of Credit = highest balance ever attained                      Installment = original amount of the loan excluding interest payments                      Mortgage = original amount of the loan excluding interest payments                      Open = highest balance ever attained                      Revolving = highest balance ever attained</p> <p>For companies who report returned checks, such as collection agencies, report the original amount of the check, excluding fees and interest.</p>	5	80-84	P	9	93-101	N
13	<p><b>Terms Duration</b> Contains the duration of credit extended.</p> <p>Line of Credit = Constant of <b>LOC</b>                      Installment = Number of months                      Mortgage = Number of years                      Open = Constant of <b>001</b>  <i>One payment as scheduled</i>                      Revolving = Constant of <b>REV</b></p> <p>Exhibit 3 provides the calculations necessary to convert Terms Duration to monthly.</p>	3	85-87	AN	3	102-104	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
14	<p><b>Terms Frequency</b> Report the frequency for payments due. Values available:</p> <p>D = Deferred (Refer to Note) P = Single Payment Loan W = Weekly B = Biweekly E = Semimonthly M = Monthly L = Bimonthly Q = Quarterly T = Triannually S = Semiannually Y = Annually</p> <p>Exhibit 3 provides definitions of the Terms Frequency Codes.</p> <p><b>Note: When reporting Deferred loans, report the Deferred Payment Start Date in the K4 Segment.</b></p>	1	88	AN	1	105	AN
15	<p><b>Scheduled Monthly Payment Amount</b> Report the dollar amount of the scheduled monthly payment, whether principal, interest only or a combination of the two. Report in whole dollars only.</p> <p>Line of Credit = minimum amount due based on balance, not including any amounts past due</p> <p>Installment = regular monthly payment</p> <p>Mortgage = regular monthly payment, including the principal, interest, and escrow</p> <p>Open = zero fill</p> <p>Revolving = minimum amount due based on balance, not including any amounts past due</p> <p>Exhibit 3 provides the calculations necessary to convert payment amounts to monthly.</p>	5	89-93	P	9	106-114	N
16	<p><b>Actual Payment Amount</b> Report the dollar amount of the monthly payment actually received for this reporting period in whole dollars only.</p> <p>If multiple payments are made during the reporting period, the total amount should be reported.</p>	5	94-98	P	9	115-123	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
17A	<p><b>Account Status</b> Contains the status code that properly identifies the current condition of the account as of the Date of Account Information (Field 24).</p> <p>Exhibit 4 provides a description of these codes.</p> <p>The Payment Rating (Field 17B) must also be reported when the Account Status Code is 05, 13, 65, 88, 89, 94, or 95.</p> <p>Special Comments (Field 19) may be used in conjunction with the Account Status to further define the account.</p> <p>For examples of how Account Statuses, Payment Ratings and Special Comments interact, refer to Frequently Asked Question 12.</p>	2	99-100	AN	2	124-125	AN
17B	<p><b>Payment Rating</b> When the Account Status (Field 17A) contains 05, 13, 65, 88, 89, 94 or 95, this field must also be reported.</p> <p>The Payment Rating contains a code that properly identifies whether the account is current, past due, in collections or charged off <b><i>within the activity period being reported</i></b>. Values available:</p> <p>0 = Current account (0–29 days past the due date) 1 = 30-59 days past the due date 2 = 60-89 days past the due date 3 = 90-119 days past the due date 4 = 120-149 days past the due date 5 = 150-179 days past the due date 6 = 180 or more days past the due date G = Collection L = Charge-off</p> <p>For example, if the account was paid on July 22, 2006, but the consumer was 30 days past the due date on July 10, 2006 prior to paying the account, report Account Status Code = 13 and Payment Rating = 1.</p>	1	101	AN	1	126	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
18	<p><b>Payment History Profile</b> Contains up to 24 months of consecutive payment activity for the previous 24 calendar months prior to the Date of Account Information (Field 24) being reported. Report one month's payment record in each byte from the left to right in most recent to least recent order. The first byte should represent the previous month's status. Values available:</p> <p>0 = 0 payments past due (current account)            1 = 30 - 59 days past due date            2 = 60 - 89 days past due date            3 = 90 - 119 days past due date            4 = 120 - 149 days past due date            5 = 150 - 179 days past due date            6 = 180 or more days past due date            B = No payment history available prior to this time. A "B" may not be embedded within other values.            D = No payment history available this month. "D" may be embedded in the payment pattern.            E = Zero balance and current account (Applies to Credit Cards and Lines of Credit)            G = Collection            H = Foreclosure            J = Voluntary Surrender            K = Repossession            L = Charge-off</p> <p><b>No other values are acceptable in this field.</b></p> <p>If a full 24 months of history are not available for reporting, the ending positions of this field should be filled with Bs.</p> <p>The Payment History Profile is intended to be used to report <b>monthly</b> history, regardless of the Terms Frequency.</p> <p>Reporting of the Payment History Profile provides a method for automated correction of erroneously reported history.</p> <p>Exhibit 5 provides examples of reporting payment history.</p> <p>For important information:</p> <ul style="list-style-type: none"> <li>• Paid accounts - refer to Frequently Asked Question 38.</li> <li>• First-time reporters - refer to Frequently Asked Question 25.</li> </ul>	24	102-125	AN	24	127-150	AN

# Field Definitions

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## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
19	<p><b>Special Comment</b> Used in conjunction with Account Status (Field 17A) and Payment Rating (Field 17B) to further define the account (e.g., closed accounts or adjustments pending). The Special Comment Code must be reported as long as the condition applies.</p> <p>Exhibit 6 provides a list of available comments by category within portfolio type, and Exhibit 7 provides a description of the comments available.</p> <p>For examples of how Account Statuses, Payment Ratings and Special Comments interact, refer to Frequently Asked Question 12.</p>	2	126-127	AN	2	151-152	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
20	<p><b>Compliance Condition Code</b> Allows the reporting of a condition that is required for legal compliance; e.g., according to the Fair Credit Reporting Act (FCRA) or Fair Credit Billing Act (FCBA).</p> <p>This condition may refer to accounts closed at consumer's request, accounts in dispute under FCRA or accounts in dispute under FCBA.</p> <p>The code should be reported one time and will be deleted only when another Compliance Condition Code or the <b>XR</b> (Remove value) is reported.</p> <p>Exhibit 14 provides a list of Compliance Condition Codes and an example that demonstrates how to report these codes.</p> <p><b>Note: When converting from Metro to Metro 2, it is necessary to report the applicable Compliance Condition Code on your first Metro 2 submission, even if you had reported this information through a Special Comment on your last Metro submission.</b></p>	2	128-129	AN	2	153-154	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
21	<p><b>Current Balance</b> Report the total current balance of the account, whether increasing or declining, in whole dollars only. This field can include late charges and fees. Report credit balances (negative balances) as zero.</p> <p>For mortgage portfolio types, report the principal balance plus the interest and escrow due this month. Do not include future interest, escrow, fees or insurance payments.</p>	5	130-134	P	9	155-163	N
22	<p><b>Amount Past Due</b> Report the amount past due in whole dollars only. This field can include late charges and fees. <b>Do not include current amount due in this field.</b></p> <p><b>Note: If the Account Status is current (Status Code 11), this field should be zero.</b></p>	5	135-139	P	9	164-172	N
23	<p><b>Original Charge-off Amount</b> For Status Codes 64 and 97 (all portfolio types), report the original amount charged to loss, regardless of the declining balance. Report whole dollars only.</p> <p>If payments are received from the consumer, report the outstanding balance in the Current Balance and Amount Past Due fields.</p>	5	140-144	P	9	173-181	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
24	<p><b>Date of Account Information</b> All account information in the Base Segment, such as Account Status and Current Balance, must be reported <i>as of</i> the date in this field.</p> <p><b>Cycle Reporters</b> – Report the date of the current month’s billing cycle. <i><b>This method is preferred to facilitate accurate and timely reporting of account information.</b></i></p> <p><b>Monthly Reporters</b> – Report the date of the most recent update to balances, such as mid-month (08/15/2006) or end of month (08/31/2006).</p> <p>For Account Status Codes 11, 71, 78, 80, 82-84, 88, 89, 93-97, DA and DF, report the current month’s date. For Account Status Codes 05, 13, 61–65, report the date transferred or paid.</p> <p>Format for packed date is OMMDDYYYYs – where s is the sign. Format is MMDDYYYY for character date.</p> <p><b>Notes: This date must not reflect a future date.</b></p> <p><b>This field was formerly called Billing Date.</b></p>	5	145-149	P	8	182-189	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
25	<p><b>FCRA Compliance/Date of First Delinquency</b></p> <p>For Account Status Codes 61-65, 71, 78, 80, 82-84, 88-89 and 93-97, report the date of the first delinquency that led to the status being reported. If a delinquent account becomes current, the Date of First Delinquency should be zero filled. Then if the account goes delinquent again, the Date of First Delinquency starts over with the new first delinquency date.</p> <p>For Account Status Codes 05 and 13, if the Payment Rating is 1, 2, 3, 4, 5, 6, G or L, report the date of the first delinquency that led to the Payment Rating being reported.</p> <p>For Consumer Information Indicators A-H and Z (Bankruptcies), 1A (Personal Receivership) and V-Y (Reaffirmation of Debt Rescinded with Bankruptcy Chapters), if the account is current (Account Status Code 11 or Account Status Code 05 or 13 with Payment Rating 0), report the date of the bankruptcy/personal receivership notification. Even though the account is not delinquent, this date is required for purging purposes.</p> <p>Format for packed date is OMMDDYYYYs — where s is the sign. Format is MMDDYYYY for character date.</p> <p>This date is used to ensure compliance with the Fair Credit Reporting Act.</p> <p>Refer to Exhibit 8 for detailed reporting instructions, examples and an excerpt from the law (FCRA).</p> <p>First-time reporters should refer to Frequently Asked Question 25 for important information.</p>	5	150-154	P	8	190-197	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
26	<p><b>Date Closed</b> For all portfolio types, contains the date the account was closed to further purchases or paid in full. For Line of Credit, Open or Revolving accounts, there may be a balance due.</p> <p>Format for packed date is OMMDDYYYYs — where s is the sign. Format is MMDDYYYY for character date. If not applicable, zero fill.</p>	5	155-159	P	8	198-205	N
27	<p><b>Date of Last Payment</b> Report the date of the most recent consumer payment, whether full or partial payment is made.</p> <p>Format for packed date is OMMDDYYYYs — where s is the sign. Format is MMDDYYYY for character date. If the day is not available, use 01.</p>	5	160-164	P	8	206-213	N
28	<p><b>Reserved</b> Blank fill.</p>	17	165-181	AN	17	214-230	AN
29	<p><b>Consumer Transaction Type</b> Used to indicate a new record, a new borrower or a change in consumer identification. Values available:</p> <ul style="list-style-type: none"> <li>1 = Newly opened account, or new borrower associated with existing account</li> <li>2 = Name change</li> <li>3 = Address change</li> <li>5 = Social Security Number change</li> <li>6 = Name &amp; Address change</li> <li>8 = Name &amp; Social Security Number change</li> <li>9 = Address &amp; Social Security Number change</li> <li>A = Name, Address and/or Social Security Number change</li> </ul> <p>If account or borrower is not new, or if no change in consumer information, blank fill.</p>	1	182	AN	1	231	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
30	<p><b>Surname</b> Report the last name of the primary consumer. Titles and prefixes should not be reported.</p> <p>If the surname contains multiple last names, hyphenate the two surnames. For example, Smith-Jones requires the hyphen.</p> <p>If the surname contains two separate words, the hyphen is not required. For example, report Van Dyke with a space between the two words.</p> <p>If reporting Hispanic names, hyphenate the two surnames: Paternal Name - Maternal Name.</p> <p>The Generation Code should be reported in Field 33.</p> <p><b>Note: Do not report trustee or estate accounts.</b></p>	25	183-207	AN	25	232-256	AN
31	<p><b>First Name</b> Report the first name of the primary consumer.</p> <p>If reporting multiple first names, hyphenate the two first names.</p>	20	208-227	AN	20	257-276	AN
32	<p><b>Middle Name</b> Report the middle name or middle initial of the primary consumer, if available.</p> <p>If reporting multiple middle names, hyphenate the two middle names.</p>	20	228-247	AN	20	277-296	AN
33	<p><b>Generation Code</b> Used to distinguish Junior, Senior, II, III, IV, etc. If not applicable, blank fill. Values available:</p> <p>J = Junior            5 = V S = Senior            6 = VI 2 = II                    7 = VII 3 = III                   8 = VIII 4 = IV                    9 = IX</p>	1	248	AN	1	297	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
34	<p><b>Social Security Number</b> Report the Social Security Number of the primary consumer. Report only valid SSNs. If the consumer does not have an SSN or one is not available for reporting, zero- or 9-fill all positions.</p> <p><b>Note: Do not report Individual Tax Identification Numbers (ITINs) in this field. ITINs do not prove identity outside the tax system and should not be offered or accepted as identification for non-tax purposes, per the Social Security Administration.</b></p>	5	249-253	P	9	298-306	N
35	<p><b>Date of Birth</b> Contains the date of birth of the primary consumer. Reporting of this information is highly recommended as the date of birth greatly enhances accuracy in matching to the correct consumer. If not available, zero fill the entire field.</p> <p>Format for packed date is OMMDDYYYYs — where s is the sign. Format is MMDDYYYY for character date.</p> <p>If the month and day are not available, use 0101. The four-digit year is required.</p> <p><b>Note: Do not report accounts of consumers who are too young to enter into a binding contract.</b></p>	5	254-258	P	8	307-314	N
36	<p><b>Telephone Number</b> Contains the telephone number of the primary consumer (Area Code + 7 digits).</p>	6	259-264	P	10	315-324	N

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
37	<p><b>ECOA Code</b> Defines the relationship of the primary consumer to the account and designates the account as joint, individual, etc., in compliance with the Equal Credit Opportunity Act. Values available:</p> <p>1 = Individual <i>This consumer has contractual responsibility for this account and is primarily responsible for its payment.</i></p> <p>2 = Joint Contractual Liability <i>Joint account for which this consumer has contractual responsibility.</i></p> <p>7 = Maker <i>Account for which consumer is liable but a co-maker or guarantor is liable if the maker defaults.</i></p> <p>T = Association with account terminated X = Consumer Deceased Z = Delete Consumer</p> <p><b>Note: Only inaccurately reported consumers should be deleted.</b></p> <p>Refer to Frequently Asked Question 21 for guidelines on reporting consumers who are personally liable for business accounts.</p> <p><b>Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.</b></p>	1	265	AN	1	325	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
38	<p><b>Consumer Information Indicator</b> Contains a value that indicates a special condition of the account that applies to the primary consumer.</p> <p>This special condition may be that a bankruptcy was filed, discharged, dismissed or withdrawn; a debt was reaffirmed; or the consumer cannot be located or is now located.</p> <p>The indicator should be reported one time and will be deleted only when the appropriate removal code (Q, S, U) is reported.</p> <p>Exhibit 9 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines for accounts in bankruptcy, refer to Frequently Asked Questions 27, 28, 29, 30 and 31.</p> <p><b>Note: When converting from Metro to Metro 2, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2 submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro submission.</b></p>	2	266-267	AN	2	326-327	AN
39	<p><b>Country Code</b> Contains the standard two-character country abbreviation.</p> <p>Exhibit 10 provides a list of the Country Codes.</p>	2	268-269	AN	2	328-329	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
40	<p><b>First Line of Address</b> Contains mailing address for the primary consumer and usually includes street number, direction, street name, and type of thoroughfare.</p> <p>If the mailing address is a PO Box or Rural Route, include Box or Route followed by the number (e.g., PO Box 100). Do not report both a street address and a PO Box.</p> <p>If the mailing address is a private mailbox (PMB), the street address should be reported in the First Line of Address (e.g., 5678 Main Street). The PMB number should be reported in the Second Line of Address (e.g., PMB 1234). As an alternative, the entire address can be reported in the First Line of Address; for example, 5678 Main Street, PMB 1234.</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", "Estate of", etc.</p> <p>Exhibit 11 provides general rules for address reporting. Do not enter data furnisher's address in this field.</p>	32	270-301	AN	32	330-361	AN
41	<p><b>Second Line of Address</b> Contains second line of address, if needed, such as apartment or unit number, or private mailbox number (PMB).</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", or "Estate of", etc.</p>	32	302-333	AN	32	362-393	AN
42	<p><b>City</b> Contains city name for address of primary consumer. Truncate rightmost positions if city name is greater than 20 characters or use standard 13-character U.S. Postal Service city abbreviations.</p>	20	334-353	AN	20	394-413	AN

# Field Definitions

## Base Segment

FIELD	FIELD NAME & DESCRIPTION	366 BASE (Packed Format)			426 BASE (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
43	<p><b>State</b> Contains the standard U.S. Postal Service state abbreviation for the address of the primary consumer.</p> <p>Exhibit 12 provides a list of State Codes.</p>	2	354-355	AN	2	414-415	AN
44	<p><b>Postal/Zip Code</b> Report the Zip Code of the primary consumer's address. Use entire field if reporting 9-digit zip codes. Otherwise, left-justify and blank fill.</p>	9	356-364	AN	9	416-424	AN
45	<p><b>Address Indicator</b> Contains one of the following values for the address reported in fields 40-44:</p> <p>Y = Known to be address of primary consumer            N = Not confirmed address            B = Business address — not consumer's residence            U = Non-deliverable address/Returned mail            D = Data reporter's default address            M = Military address            S = Secondary Address            P = Bill Payer Service — not consumer's residence</p> <p>If indicator not available or unknown, blank fill.</p>	1	365	AN	1	425	AN
46	<p><b>Residence Code</b> Contains the one-character residence code of the address reported in fields 40-44. Values available:</p> <p>O = Owns            R = Rents</p> <p>If not available or unknown, blank fill.</p>	1	366	AN	1	426	AN

# Field Definitions

## J1 Segment

### Associated Consumer—Same Address

The J1 Segment is designed to accommodate the requirements of ECOA and applies when the associated consumer resides at the same address as the individual reported in the Base Segment. This segment must be present each time the account is reported.

Multiple occurrences of the J1 Segment can be appended to the Base Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>J1</b> .	2	1-2	AN
2	<b>Consumer Transaction Type</b> Used to indicate a new record, a new borrower or a change in consumer identification. Values available:  1 = Newly opened account, or new borrower associated with existing account 2 = Name change 3 = Address change 5 = Social Security Number change 6 = Name & Address change 8 = Name & Social Security Number change 9 = Address & Social Security Number change A = Name, Address and/or Social Security Number change  If account or borrower is not new, or if no change in consumer information, blank fill.	1	3	AN
3	<b>Surname</b> Report the last name of the associated consumer. Titles and prefixes should not be reported.  If the surname contains multiple last names, hyphenate the two surnames. For example, Smith-Jones requires the hyphen.  If the surname contains two separate words, the hyphen is not required. For example, report Van Dyke with a space between the two words.  If reporting Hispanic names, hyphenate the two surnames: Paternal Name - Maternal Name.  The Generation Code should be reported in Field 6.  <b>Note: Do not report trustee or estate accounts.</b>	25	4-28	AN

# Field Definitions

## J1 Segment

### Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
4	<p><b>First Name</b> Report the first name of the associated consumer.</p> <p>If reporting multiple first names, hyphenate the two first names.</p>	20	29-48	AN
5	<p><b>Middle Name</b> Report the middle name or middle initial of the associated consumer, if available.</p> <p>If reporting multiple middle names, hyphenate the two middle names.</p>	20	49-68	AN
6	<p><b>Generation Code</b> Used to distinguish Junior, Senior, II, III, IV, etc. If not applicable, blank fill. Values available:</p> <p>J = Junior    3 = III    6 = VI    9 = IX S = Senior    4 = IV    7 = VII 2 = II        5 = V    8 = VIII</p>	1	69	AN
7	<p><b>Social Security Number</b> Report the Social Security Number of the associated consumer. Report only valid SSNs. If the consumer does not have an SSN or one is not available for reporting, zero- or 9-fill all positions.</p> <p><b>Note: Do not report Individual Tax Identification Numbers (ITINs) in this field. ITINs do not prove identity outside the tax system and should not be offered or accepted as identification for non-tax purposes, per the Social Security Administration.</b></p>	9	70-78	N
8	<p><b>Date of Birth</b> Contains the date of birth of the associated consumer. Reporting of this information is highly recommended as the date of birth greatly enhances accuracy in matching to the correct consumer. If not available, zero fill the entire field.</p> <p>Format is MMDDYYYY.</p> <p>If the month and day are not available, use 0101. The four-digit year is required.</p> <p><b>Note: Do not report accounts of consumers who are too young to enter into a binding contract.</b></p>	8	79-86	N

# Field Definitions

## J1 Segment

### Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
9	<p><b>Telephone Number</b> Contains the telephone number of the associated consumer (Area Code + 7 digits).</p>	10	87-96	N
10	<p><b>ECOA Code</b> Defines the relationship of the associated consumer to the account and designates the account as joint, individual, etc., in compliance with the Equal Credit Opportunity Act. Values available:</p> <p>2 = Joint Contractual Liability <i>Joint account for which this consumer has contractual responsibility.</i></p> <p>3 = Authorized User <i>This consumer is an authorized user of this account; another consumer has contractual responsibility.</i></p> <p>5 = Co-Maker or Guarantor <i>Account for which the consumer is the co-maker or guarantor, who becomes liable if the maker defaults; no spousal relationship.</i></p> <p>T = Association with account terminated</p> <p>W = Business/Commercial <i>Used to identify that the company reported in the name field is contractually liable for the account.</i></p> <p>X = Consumer Deceased</p> <p>Z = Delete Consumer</p> <p><b>Note: Only inaccurately reported consumers should be deleted.</b></p> <p>Refer to Frequently Asked Question 21 for guidelines on reporting consumers who are personally liable for business accounts.</p> <p><b>Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.</b></p>	1	97	AN

# Field Definitions

## J1 Segment

### Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
11	<p><b>Consumer Information Indicator</b> Contains a value that indicates a special condition of the account that applies to the associated consumer.</p> <p>This special condition may be that a bankruptcy was filed, discharged, dismissed or withdrawn; a debt was reaffirmed; or the consumer cannot be located or is now located.</p> <p>The indicator should be reported one time and will be deleted only when the appropriate removal code (Q, S, U) is reported.</p> <p>Exhibit 9 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines for accounts in bankruptcy, refer to Frequently Asked Questions 27, 28, 29, 30 and 31.</p> <p><b>Note: When converting from Metro to Metro 2, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2 submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro submission.</b></p>	2	98-99	AN
12	<p><b>Reserved</b> Blank fill.</p>	1	100	AN

**Note: For additional reporting guidelines specific to the J1 Segment, refer to Frequently Asked Questions 6, 7 and 18.**

# Field Definitions

## J2 Segment Associated Consumer—Different Address

The J2 Segment is designed to accommodate the requirements of ECOA and applies when the associated consumer resides at a different address than the individual reported in the Base Segment. The J2 Segment must always contain an address, even if the address is the same as the one reported in the Base Segment. This segment must be present each time the account is reported.

Multiple occurrences of the J2 Segment can be appended to the Base Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>J2</b> .	2	1-2	AN
2	<b>Consumer Transaction Type</b> Used to indicate a new record, a new borrower or a change in consumer identification. Values available:  1 = Newly opened account, or a new borrower associated with existing account 2 = Name change 3 = Address change 5 = Social Security Number change 6 = Name & Address change 8 = Name & Social Security Number change 9 = Address & Social Security Number change A = Name, Address and/or Social Security Number change  If account or borrower is not new, or if no change in consumer information, blank fill.	1	3	AN
3	<b>Surname</b> Report the last name of the associated consumer. Titles and prefixes should not be reported.  If the surname contains multiple last names, hyphenate the two surnames. For example, Smith-Jones requires the hyphen.  If the surname contains two separate words, the hyphen is not required. For example, report Van Dyke with a space between the two words.  If reporting Hispanic names, hyphenate the two surnames: Paternal Name - Maternal Name.  The Generation Code should be reported in Field 6.  <b>Note: Do not report trustee or estate accounts.</b>	25	4-28	AN

# Field Definitions

## J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
4	<p><b>First Name</b> Report the first name of the associated consumer. If reporting multiple first names, hyphenate the two first names.</p>	20	29-48	AN
5	<p><b>Middle Name</b> Report the middle name or middle initial of the associated consumer, if available.  If reporting multiple middle names, hyphenate the two middle names.</p>	20	49-68	AN
6	<p><b>Generation Code</b> Used to distinguish Junior, Senior, II, III, IV, etc. If not applicable, blank fill. Values available:  J = Junior    3 = III    6 = VI    9 = IX S = Senior    4 = IV    7 = VII 2 = II        5 = V    8 = VIII</p>	1	69	AN
7	<p><b>Social Security Number</b> Report the Social Security Number of the associated consumer. Report only valid SSNs. If the consumer does not have an SSN or if one is not available for reporting, zero- or 9-fill all positions.  <b>Note: Do not report Individual Tax Identification Numbers (ITINs) in this field. ITINs do not prove identity outside the tax system and should not be offered or accepted as identification for non-tax purposes, per the Social Security Administration.</b></p>	9	70-78	N
8	<p><b>Date of Birth</b> Contains the date of birth of the associated consumer. Reporting of this information is highly recommended as the date of birth greatly enhances accuracy in matching to the correct consumer. If not available, zero fill the entire field.  Format is MMDDYYYY.  If the month and day are not available, use 0101. The four-digit year is required.  <b>Note: Do not report accounts of consumers who are too young to enter into a binding contract.</b></p>	8	79-86	N

# Field Definitions

## J2 Segment

### Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
9	<p><b>Telephone Number</b> Contains the telephone number of the associated consumer (Area Code + 7 digits).</p>	10	87-96	N
10	<p><b>ECOA Code</b> Defines the relationship of the associated consumer to the account and designates the account as joint, individual, etc., in compliance with the Equal Credit Opportunity Act. Values available:</p> <p>2 = Joint Contractual Liability <i>Joint account for which this consumer has contractual responsibility.</i></p> <p>3 = Authorized User <i>This consumer is an authorized user of this account; another consumer has contractual responsibility.</i></p> <p>5 = Co-Maker or Guarantor <i>Account for which the consumer is the co-maker or guarantor, who becomes liable if the maker defaults; no spousal relationship.</i></p> <p>T = Association with account terminated</p> <p>W = Business/Commercial <i>Used to identify that the company reported in the name field is contractually liable for the account.</i></p> <p>X = Consumer Deceased</p> <p>Z = Delete Consumer</p> <p><b>Note: Only inaccurately reported consumers should be deleted.</b></p> <p>Refer to Frequently Asked Question 21 for guidelines on reporting consumers who are personally liable for business accounts.</p> <p><b>Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.</b></p>	1	97	AN

# Field Definitions

## J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
11	<p><b>Consumer Information Indicator</b> Contains a value that indicates a special condition of the account that applies to the associated consumer.</p> <p>This special condition may be that a bankruptcy was filed, discharged, dismissed or withdrawn; a debt was reaffirmed; or the consumer cannot be located or is now located.</p> <p>The indicator should be reported one time and will be deleted only when the appropriate removal code (Q, S, U) is reported.</p> <p>Exhibit 9 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines for accounts in bankruptcy, refer to Frequently Asked questions 27, 28, 29, 30 and 31.</p> <p><b>Note: When converting from Metro to Metro 2, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2 submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro submission.</b></p>	2	98-99	AN
12	<p><b>Country Code</b> Contains the standard two-character country abbreviation.</p> <p>Exhibit 10 provides a list of the Country Codes.</p>	2	100-101	AN

# Field Definitions

## J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
13	<p><b>First Line of Address</b> Contains mailing address for associated consumer and usually includes street number, direction, street name, and type of thoroughfare.</p> <p>If the mailing address is a PO Box or Rural Route, include Box or Route followed by the number (e.g., PO Box 100). Do not report both a street address and a PO Box.</p> <p>If the mailing address is a private mailbox (PMB), the street address should be reported in the First Line of Address (e.g., 5678 Main Street). The PMB number should be reported in the Second Line of Address (e.g., PMB 1234). As an alternative, the entire address can be reported in the First Line of Address; for example, 5678 Main Street, PMB 1234.</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", "Estate of", etc.</p> <p>Exhibit 11 provides general rules for address reporting.</p> <p>Do not enter data furnisher's address in this field.</p>	32	102-133	AN
14	<p><b>Second Line of Address</b> Contains second line of address, if needed, such as apartment or unit number, or private mailbox number (PMB).</p> <p>Eliminate internal messages such as: "Do not mail", "Attorney", "Charge-off", "Chapter 13", "Fraud", "Trustee", "Estate of", etc.</p>	32	134-165	AN
15	<p><b>City</b> Contains city name for address of associated consumer. Truncate rightmost positions if city name is greater than 20 characters or use standard 13-character U.S. Postal Service city abbreviations.</p>	20	166-185	AN

# Field Definitions

## J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
16	<p><b>State</b> Contains the standard U.S. Postal Service state abbreviation for the address of the associated consumer.</p> <p>Exhibit 12 provides a list of State Codes.</p>	2	186-187	AN
17	<p><b>Postal/Zip Code</b> Report the Zip Code of the associated consumer's address. Use entire field if reporting 9-digit zip codes. Otherwise, left-justify and blank fill.</p>	9	188-196	AN
18	<p><b>Address Indicator</b> Contains one of the following values for the address reported in fields 13-17:</p> <p>Y = Known to be address of associated consumer N = Not confirmed address B = Business address — not consumer's residence U = Non-deliverable address/Returned mail D = Data reporter's default address M = Military address S = Secondary address P = Bill Payer Service — not consumer's residence</p> <p>If indicator not available or unknown, blank fill.</p>	1	197	AN
19	<p><b>Residence Code</b> Contains the one-character residence code of the address reported in fields 13-17. Values available:</p> <p>O = Owns R = Rents</p> <p>If not available or unknown, blank fill.</p>	1	198	AN
20	<p><b>Reserved</b> Blank fill.</p>	2	199-200	AN

**Note:** For additional reporting guidelines specific to the J2 Segment, refer to Frequently Asked Questions 6, 7 and 18.

# Field Definitions

## K1 Segment Original Creditor Name

The K1 Segment must be present each time the account is reported by collection agencies, debt collectors, factoring companies, check guarantee companies, student loan guaranty agencies, and the U.S. Department of Education. The purpose of reporting the original creditor name is to help consumers identify the source of accounts when they appear on credit reports. Without the original creditor names, consumers may not know what the accounts represent.

Some state laws and CDIA policy stipulate that the original client/creditor must be identified. Federal law stipulates that the name of the payee must be identified when reporting returned checks.

Only one occurrence of the K1 Segment can be appended to the Base Segment. If not applicable, do not report the K1 Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>K1</b> .	2	1-2	AN
2	<p><b>Original Creditor Name</b> The original creditor name is the name of the company or agent who originally opened the account for the consumer.</p> <p>This free-form description of the original creditor name is used by collection agencies, debt collectors, factoring companies, check guarantee companies, student loan guaranty agencies, and the U.S. Department of Education.</p> <p>For companies who report returned checks, such as collection agencies, report the name of the payee.</p> <p>To assist with compliance of the Fair Credit Reporting Act, companies who report medical debts or returned checks for medical purposes must report Creditor Classification '02' (Field 3) to indicate 'Medical/Health Care'. The actual name of the original creditor should continue to be reported in Field 2.</p> <p>One of the following three options should be used when reporting a creditor's name that would reveal sensitive information about the consumer.</p> <ol style="list-style-type: none"> <li>1. Report the name of the institution, but do not include reference to the type of service. For example, use the hospital name without identifying that it was the psychiatric unit that provided care. If a hospital's name reveals sensitive information, abbreviate the name.</li> <li>2. Use the corporate name if it is different from the commercial name of a mental institution or drug rehabilitation center.</li> <li>3. Do not report the account if either of the above two options would not sufficiently protect the consumer's privacy.</li> </ol> <p><b>Note: Encoded information is not acceptable in this field.</b></p>	30	3-32	AN

# Field Definitions

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## K1 Segment Original Creditor Name

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
3	<p><b>Creditor Classification</b> Contains a code indicating a general type of business for the Original Creditor Name. Values available:</p> <ul style="list-style-type: none"> <li>01 Retail</li> <li>02 Medical/Health Care <i>Required when reporting medical debts and returned checks from providers of medical services, products or devices</i></li> <li>03 Oil Company</li> <li>04 Government</li> <li>05 Personal Services</li> <li>06 Insurance</li> <li>07 Educational</li> <li>08 Banking</li> <li>09 Rental/Leasing</li> <li>10 Utilities</li> <li>11 Cable/Cellular</li> <li>12 Financial</li> <li>13 Credit Union</li> <li>14 Automotive</li> <li>15 Check Guarantee</li> </ul>	2	33-34	N

# Field Definitions

## K2 Segment Purchased Portfolio/Sold To

The K2 Segment may be used to report the name of the company from which the portfolio or partial portfolio was purchased or the name of the company to which the portfolio or partial portfolio was sold. The K2 Segment should be reported only one time per record to affect the change.

Only one occurrence of the K2 Segment can be appended to the Base Segment. If not applicable, do not report the K2 Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>K2</b> .	2	1-2	AN
2	<b>Portfolio Indicator</b> Contains a code representing the type of information being reported. Values available:  1 = Portfolio Purchased From Name 2 = Sold To Name 9 = Remove Previously Reported K2 Segment Information	1	3	N
3	<b>Purchased Portfolio or Sold To Name</b> Contains a free-form description of the name of the company from which the portfolio or partial portfolio was purchased or to which the account was sold.  If field 2 = 9, this field should be blank filled.	30	4-33	AN
4	<b>Reserved</b> Blank fill.	1	34	AN

**Note: The K2 segment should *not* be reported by collection agencies, debt purchasers, factoring companies, check guarantee companies, student loan guaranty agencies and the U.S. Department of Education.**

# Field Definitions

## K3 Segment Mortgage Information

The K3 Segment is used for two purposes:

1. To indicate a secondary marketing agency's interest in a loan by providing the applicable account number as assigned by the secondary marketing agency.
2. To report the Mortgage Identification Number (MIN), when available.

This segment must be present each time the account is reported. Only one occurrence of the K3 Segment can be appended to the Base Segment. If not applicable, do not report the K3 Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>K3</b> .	2	1-2	AN
2	<b>Agency Identifier</b> Contains a code indicating which secondary marketing agency has interest in this loan. Values available:  00 = Agency Identifier not applicable (Used when reporting MIN only) 01 = Fannie Mae 02 = Freddie Mac	2	3-4	N
3	<b>Account Number</b> Contains the account number as assigned by the secondary marketing agency. <b>Do not include embedded blanks or special characters.</b>  If field 2 = 00, this field should be blank filled.	18	5-22	AN
4	<b>Mortgage Identification Number (MIN)</b> Contains the Mortgage Identification Number assigned to a mortgage loan. <b>Do not include embedded blanks or special characters.</b>  The MIN indicates that the loan is registered with the Mortgage Electronic Registration Systems, Inc. (MERS), the electronic registry for tracking the ownership of mortgage rights. For more information, see <a href="http://www.mersinc.org">http://www.mersinc.org</a> .	18	23-40	AN

# Field Definitions

## K4 Segment Specialized Payment Information

The K4 Segment can be used to report information on specialized payment schedules for either deferred payments or balloon payments. This segment must be present each time the account is reported if a deferred or balloon payment applies to the account.

If an account has both deferred and balloon payments, report the Deferred Payment Start Date as long as payments are deferred. When the account is in repayment, report the Balloon Payment Due Date and Amount.

Only one occurrence of the K4 Segment can be appended to the Base Segment. If not applicable, do not report the K4 Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>K4</b> .	2	1-2	AN
2	<b>Specialized Payment Indicator</b> Contains a code describing the specialized payment arrangements. Values available:  01 = Balloon Payment 02 = Deferred Payment	2	3-4	N
3	<b>Deferred Payment Start Date</b> Report the date the first payment is due for deferred loans. Format is MMDDYYYY. If the day is not available, use 01.  This date should be reported when the Terms Frequency (Base Segment, Field 14) indicates Deferred.  Refer to Frequently Asked Question 41 for guidelines on reporting deferred loans.	8	5-12	N
4	<b>Payment Due Date</b> Report the date the balloon payment is due, if applicable. Format is MMDDYYYY. If the day is not available, use 01.	8	13-20	N
5	<b>Payment Amount</b> Report the amount of the balloon payment in whole dollars only.	9	21-29	N
6	<b>Reserved</b> Blank fill.	1	30	AN

**Note: All other account information should be reported in the Base Segment.**

# Field Definitions

## L1 Segment

### Account Number/Identification Number Change

The L1 Segment provides an automated method for changing the Consumer Account Number and/or Identification Number and should be reported only one time per record to affect the change.

The L1 Segment contains the new Consumer Account Number and/or the new Identification Number and the Base Segment contains the old Consumer Account Number (Field 7) and/or old Identification Number (field 5) exactly as reported previously. In any subsequent reporting period, the Base Segment should contain the new Consumer Account Number and/or new Identification Number, and the L1 Segment should not be reported.

If the L1 Segment is being reported for the first time, or if L1 Segments are to be used for portfolio acquisition or a mass Consumer Account Number and/or Identification Number change, contact your consumer reporting agencies.

Only one occurrence of the L1 Segment can be appended to the Base Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>L1</b> .	2	1-2	AN
2	<b>Change Indicator</b> Contains a code representing the change being reported. Values available:  1 = Consumer Account Number Change ONLY 2 = Identification Number Change ONLY 3 = Consumer Account Number AND Identification Number Change	1	3	N
3	<b>New Consumer Account Number</b> Contains the new Account Number assigned to this account. <b>Do not include embedded blanks or special characters.</b>  If field 2 = 2, this field should be blank filled.	30	4-33	AN

# Field Definitions

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## L1 Segment Account Number/Identification Number Change

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
4	<p><b>New Identification Number</b> Contains the new Identification Number assigned to this account.</p> <p>If field 2 = 1, this field should be blank filled.</p>	20	34-53	AN
5	<p><b>Reserved</b> Blank fill.</p>	1	54	AN

**Note:** If fixed-length records are being reported and a record does not require a Consumer Account Number or Identification Number change, the Segment Identifier of L1 must be reported and the remainder of the segment must be blank filled.

# Field Definitions

## N1 Segment Employment

The N1 Segment may be used to report employment information for the consumer reported in the Base Segment.

Only one occurrence of the N1 Segment can be appended to the Base Segment. If employment is not available, do not report the N1 Segment.

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
1	<b>Segment Identifier</b> Contains a constant of <b>N1</b> .	2	1-2	AN
2	<b>Employer Name</b> Report the name of the employer for the consumer reported in the Base Segment.	30	3-32	AN
3	<b>First Line of Employer Address</b> Contains the mailing address for the employer in Field 2 and usually includes street number, direction, street name and type of thoroughfare.	32	33-64	AN
4	<b>Second Line of Employer Address</b> Contains second line of employer's address, if needed.	32	65-96	AN
5	<b>Employer City</b> Contains city name for employer's address. Truncate rightmost positions if city name is greater than 20 characters or use standard 13-character U.S. Postal Service city abbreviations.	20	97-116	AN
6	<b>Employer State</b> Contains the standard U.S. Postal Service state abbreviation for the address of the employer.  Exhibit 12 provides a list of State Codes.	2	117-118	AN
7	<b>Employer Postal/Zip Code</b> Report the zip code of the employer's address. Use entire field if reporting 9-digit zip codes. Otherwise, left-justify and blank fill.	9	119-127	AN

# Field Definitions

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## N1 Segment Employment

FIELD	FIELD NAME & DESCRIPTION	366 and 426 FORMATS		
		Length	Position	Recording Technique
8	<b>Occupation</b> Report title or position for consumer reported in the Base Segment (the employee).	18	128-145	AN
9	<b>Reserved</b> Blank fill.	1	146	AN

# Field Definitions

## Trailer Record

The Trailer Record must be the last record provided on the file. It includes cumulative totals that are used to verify that all records received have been processed.

FIELD	FIELD NAME & DESCRIPTION	366 Base (Packed Format)			426 Base (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
1	<b>Record Descriptor Word (RDW)</b> Contains a value equal to the length of the physical record. This value includes the four bytes reserved for this field.  If fixed-length records are being reported, the Trailer Record should be the same length as all the data records. The Trailer Record should be padded with blanks to fill the needed number of positions.	4	1-4	B	4	1-4	N
2	<b>Record Identifier</b> Contains a constant of <b>TRAILER</b> which is used to identify this record.	7	5-11	AN	7	5-11	AN
3	<b>Total Base Records</b> Contains the total number of Base Segments being reported.	5	12-16	P	9	12-20	N
4	<b>Reserved</b> Blank fill.	5	17-21	AN	9	21-29	AN
5	<b>Total of Status Code DF</b> Contains the total number of Base Segments with Status Code DF in Field 17A.	5	22-26	P	9	30-38	N
6	<b>Total Associated Consumer Segments (J1)</b> Contains the total number of J1 Segments being reported. Do not count blank- or 9-filled segments.	5	27-31	P	9	39-47	N
7	<b>Total Associated Consumer Segments (J2)</b> Contains the total number of J2 Segments being reported. Do not count blank- or 9-filled segments.	5	32-36	P	9	48-56	N
8	<b>Block Count</b> Contains the number of blocks on the file, if applicable.	5	37-41	P	9	57-65	N

# Field Definitions

## Trailer Record

FIELD	FIELD NAME & DESCRIPTION	366 Base (Packed Format)			426 Base (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
9	<b>Total of Status Code DA</b> Contains the total number of Base Segments with Status Code DA in Field 17A.	5	42-46	P	9	66-74	N
10	<b>Total of Status Code 05</b> Contains the total number of Base Segments with Status Code 05 in Field 17A.	5	47-51	P	9	75-83	N
11	<b>Total of Status Code 11</b> Contains the total number of Base Segments with Status Code 11 in Field 17A.	5	52-56	P	9	84-92	N
12	<b>Total of Status Code 13</b> Contains the total number of Base Segments with Status Code 13 in Field 17A.	5	57-61	P	9	93-101	N
13	<b>Total of Status Code 61</b> Contains the total number of Base Segments with Status Code 61 in Field 17A.	5	62-66	P	9	102-110	N
14	<b>Total of Status Code 62</b> Contains the total number of Base Segments with Status Code 62 in Field 17A.	5	67-71	P	9	111-119	N
15	<b>Total of Status Code 63</b> Contains the total number of Base Segments with Status Code 63 in Field 17A.	5	72-76	P	9	120-128	N
16	<b>Total of Status Code 64</b> Contains the total number of Base Segments with Status Code 64 in Field 17A.	5	77-81	P	9	129-137	N
17	<b>Total of Status Code 65</b> Contains the total number of Base Segments with Status Code 65 in Field 17A.	5	82-86	P	9	138-146	N
18	<b>Total of Status Code 71</b> Contains the total number of Base Segments with Status Code 71 in Field 17A.	5	87-91	P	9	147-155	N
19	<b>Total of Status Code 78</b> Contains the total number of Base Segments with Status Code 78 in Field 17A.	5	92-96	P	9	156-164	N
20	<b>Total of Status Code 80</b> Contains the total number of Base Segments with Status Code 80 in Field 17A.	5	97-101	P	9	165-173	N

# Field Definitions

## Trailer Record

FIELD	FIELD NAME & DESCRIPTION	366 Base (Packed Format)			426 Base (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
21	<b>Total of Status Code 82</b> Contains the total number of Base Segments with Status Code 82 in Field 17A.	5	102-106	P	9	174-182	N
22	<b>Total of Status Code 83</b> Contains the total number of Base Segments with Status Code 83 in Field 17A.	5	107-111	P	9	183-191	N
23	<b>Total of Status Code 84</b> Contains the total number of Base Segments with Status Code 84 in Field 17A.	5	112-116	P	9	192-200	N
24	<b>Total of Status Code 88</b> Contains the total number of Base Segments with Status Code 88 in Field 17A.	5	117-121	P	9	201-209	N
25	<b>Total of Status Code 89</b> Contains the total number of Base Segments with Status Code 89 in Field 17A.	5	122-126	P	9	210-218	N
26	<b>Total of Status Code 93</b> Contains the total number of Base Segments with Status Code 93 in Field 17A.	5	127-131	P	9	219-227	N
27	<b>Total of Status Code 94</b> Contains the total number of Base Segments with Status Code 94 in Field 17A.	5	132-136	P	9	228-236	N
28	<b>Total of Status Code 95</b> Contains the total number of Base Segments with Status Code 95 in Field 17A.	5	137-141	P	9	237-245	N
29	<b>Total of Status Code 96</b> Contains the total number of Base Segments with Status Code 96 in Field 17A.	5	142-146	P	9	246-254	N
30	<b>Total of Status Code 97</b> Contains the total number of Base Segments with Status Code 97 in Field 17A.	5	147-151	P	9	255-263	N

# Field Definitions

## Trailer Record

FIELD	FIELD NAME & DESCRIPTION	366 Base (Packed Format)			426 Base (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
31	<b>Total of ECOA Code Z (All Segments)</b> Contains the total number of records with ECOA Code Z being reported in the Base Segment (Field 37), in the J1 Segment (Field 10) and in the J2 Segment (Field 10).	5	152-156	P	9	264-272	N
32	<b>Total Employment Segments</b> Contains the total number of records with employment being reported in the N1 Segment.	5	157-161	P	9	273-281	N
33	<b>Total Original Creditor Segments</b> Contains the total number of records with Original Creditors being reported in the K1 Segment.	5	162-166	P	9	282-290	N
34	<b>Total Purchased Portfolio/Sold To Segments</b> Contains the total number of records with Purchased Portfolio/Sold To being reported in the K2 Segment.	5	167-171	P	9	291-299	N
35	<b>Total Mortgage Information Segments</b> Contains the total number of records with Mortgage Information being reported in the K3 Segment.	5	172-176	P	9	300-308	N
36	<b>Total Specialized Payment Information Segments</b> Contains the total number of records with Specialized Payment Information being reported in the K4 Segment.	5	177-181	P	9	309-317	N
37	<b>Total Change Segments</b> Contains the total number of Consumer Account Number and/or Identification Number changes being reported in the L1 Segment.	5	182-186	P	9	318-326	N

# Field Definitions

## Trailer Record

FIELD	FIELD NAME & DESCRIPTION	366 Base (Packed Format)			426 Base (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
38	<b>Total Social Security Numbers (All Segments)</b> Contains the total number of valid Social Security Numbers reported in the Base Segment (Field 34), in the J1 Segment (Field 7) and in the J2 Segment (Field 7). Do not count zero- or 9-filled SSNs.	5	187-191	P	9	327-335	N
39	<b>Total Social Security Numbers (Base Segments)</b> Contains the total number of valid Social Security Numbers reported in the Base Segment (Field 34). Do not count zero- or 9-filled SSNs.	5	192-196	P	9	336-344	N
40	<b>Total Social Security Numbers (J1 Segments)</b> Contains the total number of valid Social Security Numbers reported in the J1 Segment (Field 7). Do not count zero- or 9-filled SSNs.	5	197-201	P	9	345-353	N
41	<b>Total Social Security Numbers (J2 Segments)</b> Contains the total number of valid Social Security Numbers reported in the J2 Segment (Field 7). Do not count zero- or 9-filled SSNs.	5	202-206	P	9	354-362	N
42	<b>Total Dates of Birth (All Segments)</b> Contains the total number of valid Dates of Birth reported in the Base Segment (Field 35), in the J1 Segment (Field 8) and in the J2 Segment (Field 8). Do not count zero-filled Dates of Birth.	5	207-211	P	9	363-371	N
43	<b>Total Dates of Birth (Base Segments)</b> Contains the total number of valid Dates of Birth reported in the Base Segment (Field 35). Do not count zero-filled Dates of Birth.	5	212-216	P	9	372-380	N

# Field Definitions

## Trailer Record

FIELD	FIELD NAME & DESCRIPTION	366 Base (Packed Format)			426 Base (Character Format)		
		Length	Position	Recording Technique	Length	Position	Recording Technique
44	<b>Total Dates of Birth (J1 Segments)</b> Contains the total number of valid Dates of Birth reported in the J1 Segment (Field 8). Do not count zero-filled Dates of Birth.	5	217-221	P	9	381-389	N
45	<b>Total Dates of Birth (J2 Segments)</b> Contains the total number of valid Dates of Birth reported in the J2 Segment (Field 8). Do not count zero-filled Dates of Birth.	5	222-226	P	9	390-398	N
46	<b>Total Telephone Numbers (All Segments)</b> Contains the total number of valid Telephone Numbers reported in the Base Segment (Field 36), in the J1 Segment (Field 9) and in the J2 Segment (Field 9). Do not count zero-filled Telephone Numbers.	5	227-231	P	9	399-407	N
47	<b>Reserved</b> Blank fill.	135	232-366	AN	19	408-426	AN

# Exhibit 1

## Account Type Codes by Industry

The following table describes the account type codes that are reported in Field 9.

Code	Description	Check Credit	Coll. Agency	Credit Card	Credit Union	Educational	Family Support	Govt. Agency	Install Loan	Loan Finance	Mortgage Loan	Retail	Sales Finance	Service & Prof.
00	Auto				X				X	X			X	
01	Unsecured				X				X	X			X	X
02	Secured				X				X	X			X	X
03	Partially Secured				X				X	X				X
04	Home Improvement				X				X	X	X			
05	FHA Home Improvement								X		X			
06	Installment Sales Contract											X	X	
07	Charge Account											X	X	
08	Real estate, specific type unknown (Terms Duration in years) Report specific real estate type codes, when known. Refer to codes 19, 25, 26, 6B, 2C.				X						X			
10	Business Loan				X				X	X			X	
11	Recreational Merchandise				X				X	X			X	
12	Education				X	X		X	X	X				
13	Lease				X				X	X			X	
15	Check Credit/Line of Credit	X			X									

(continued)

# Exhibit 1

## Account Type Codes by Industry

Code	Description	Check Credit	Coll. Agency	Credit Card	Credit Union	Educational	Family Support	Govt. Agency	Install Loan	Loan Finance	Mortgage Loan	Retail	Sales Finance	Service & Prof.
17	Manufactured Housing				X				X	X	X		X	
18	Credit Card			X	X									
19	FHA Real Estate Mortgage (Terms Duration in years)				X						X			
20	Note Loan				X				X	X				
22	Secured by Household Goods								X	X				
23	Secured by Household Goods & Other Collateral								X	X				
25	VA Real Estate Mortgage (Terms Duration in years)				X						X			
26	Conventional Real Estate Mortgage — including Purchase Money First (Terms Duration in years)				X						X			
29	Rental Agreement													X
37	Combined Credit Plan	X		X	X									
43	Debit Card	X			X									
47	Credit Line Secured	X			X									
48	Collection Agency/Attorney		X											X

(continued)

# Exhibit 1

## Account Type Codes by Industry

Code	Description	Check Credit	Coll. Agency	Credit Card	Credit Union	Educational	Family Support	Govt. Agency	Install Loan	Loan Finance	Mortgage Loan	Retail	Sales Finance	Service & Prof.
50	Family Support						X							
65	Government Unsecured Guaranteed Loan							X						
66	Government Secured Guaranteed Loan							X						
67	Government Unsecured Direct Loan							X						
68	Government Secured Direct Loan							X						
69	Government Grant							X						
70	Government Overpayment							X						
71	Government Fine							X						
72	Government Fee for Services							X						
73	Government Employee Advance							X						
74	Government Misc. Debt							X						
75	Government Benefit							X						
77	Returned Check		X											X
89	Home Equity Line of Credit				X						X			
90	Medical Debt				X				X	X				X

(continued)

# Exhibit 1

## Account Type Codes by Industry

Code	Description	Check Credit	Coll. Agency	Credit Card	Credit Union	Educational	Family Support	Govt. Agency	Install Loan	Loan Finance	Mortgage Loan	Retail	Sales Finance	Service & Prof.
91	Debt Consolidation				X				X	X				
92	Utility Company													X
93	Child Support						X							
95	Attorney Fees						X							X
0A	Time Share Loan				X				X	X	X			
2A	Secured Credit Card			X	X									
3A	Auto Lease				X				X	X			X	
5A	Real Estate — Junior Liens and Non-Purchase Money First (Terms Duration in years)				X						X			
6A	Commercial Installment Loan				X				X	X				
7A	Commercial Line of Credit	X			X									
8A	Business Credit Card			X										
9A	Secured Home Improvement				X				X	X	X			
5B	Second Mortgage (Terms Duration in years)				X						X			
6B	Commercial Mortgage Loan (Terms Duration in years)				X						X			

(continued)

# Exhibit 1

## Account Type Codes by Industry

Code	Description	Check Credit	Coll. Agency	Credit Card	Credit Union	Educational	Family Support	Govt. Agency	Install Loan	Loan Finance	Mortgage Loan	Retail	Sales Finance	Service & Prof.
7B	Agricultural				X			X	X	X			X	
8B	Deposit Related	X			X									
9B	Business Line Personally Guaranteed	X			X									
0C	Debt Purchaser													X
1C	Household Goods								X	X				
2C	Farmers Home Administration (FmHA) Real Estate Mortgage Loan (Terms Duration in years)				X						X			
4D	Telecommunications/Cellular													X
6D	Home Equity				X				X		X			
0F	Construction Loan				X				X	X	X			
0G	Flexible Spending Credit Card			X	X									

## Exhibit 2

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### Account Type Codes

The following table contains an alphabetic listing of the account type codes, which are reported in Field 9.

Code	Description
7B	Agricultural
95	Attorney Fees
00	Auto
3A	Auto Lease <i>Refer to Frequently Asked Question 34 for guidelines specific to terminated leases.</i>
8A	Business Credit Card <i>Individual has primary responsibility.</i>
9B	Business Line Personally Guaranteed
10	Business Loan <i>Individual is personally liable.</i>
07	Charge Account <i>Used by the Retail Industry.</i>
93	Child Support
48	Collection Agency/Attorney
37	Combined Credit Plan <i>Represents two credit plans being reported as one account. Example: Visa and MasterCard on one bill.</i>
6A	Commercial Installment Loan <i>Individual is personally liable; company is guarantor.</i>
7A	Commercial Line of Credit <i>Individual is personally liable; company is guarantor.</i>
6B	Commercial Mortgage Loan <i>Terms Duration in years. Individual is personally liable; company is guarantor.</i>
0F	Construction Loan
26	Conventional Real Estate Mortgage - including Purchase Money First <i>Terms Duration in years. Purchase Money First means that the proceeds of the loan are used to buy the property. This is a mortgage account that is not guaranteed by a government agency.</i>
18	Credit Card

(continued)

## Exhibit 2

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### Account Type Codes

Code	Description
47	Credit Line Secured
43	Debit Card <i>To be used when debit card is backed by a line of credit or overdraft protection. Refer to Frequently Asked Question 26 for guidelines specific to debit cards.</i>
91	Debt Consolidation <i>Represents multiple loans which have been consolidated into one loan.</i>
0C	Debt Purchaser (a/k/a Factoring Company)
8B	Deposit Related <i>Overdrawn account.</i>
12	Education
50	Family Support
2C	Farmers Home Administration (FmHA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>
05	Federal Housing Administration (FHA) Home Improvement Loan
19	Federal Housing Administration (FHA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>
0G	Flexible Spending Credit Card <i>Credit card that combines the attributes of both revolving and open accounts. Refer to Frequently Asked Question 45 for reporting guidelines.</i>
75	Government Benefit
73	Government Employee Advance
72	Government Fee for Services
71	Government Fine
69	Government Grant
74	Government Miscellaneous Debt
70	Government Overpayment
68	Government Secured Direct Loan
66	Government Secured Guaranteed Loan
67	Government Unsecured Direct Loan

(continued)

## Exhibit 2

### Account Type Codes

Code	Description
65	Government Unsecured Guaranteed Loan
6D	Home Equity <i>Installment payments.</i>
89	Home Equity Line of Credit
04	Home Improvement
1C	Household Goods
06	Installment Sales Contract <i>Used by the Retail Industry.</i>
13	Lease <i>Non-auto.</i>
15	Line of Credit <i>Includes Check Credit.</i>
17	Manufactured Housing
90	Medical Debt
20	Note Loan
03	Partially Secured
5A	Real Estate - Junior Liens and Non-Purchase Money First <i>Terms Duration in years. Junior Liens means that a person has a mortgage on property already and needs more money without paying off existing loan; a refinanced loan with a change in terms — second mortgage, third or more. Non-Purchase Money First means that the proceeds of the loan are not used directly for the property. This is a real estate account type.</i>
08	Real estate, specific type unknown <i>Terms Duration in years. Report specific real estate type codes, when known. Refer to codes 19, 25, 26, 6B, 2C.</i>
11	Recreational Merchandise
29	Rental Agreement
77	Returned Check <i>Reported by Collection Agencies, Debt Purchasers and Check Guarantee companies when a check was returned to the payee for non-payment usually due to insufficient funds. Refer to Frequently Asked Question 16 for reporting requirements.</i>

(continued)

## Exhibit 2

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### Account Type Codes

Code	Description
5B	Second Mortgage <i>Terms Duration in years.</i>
02	Secured <i>Used for Installment Contracts.</i>
22	Secured by Household Goods
23	Secured by Household Goods and Other Collateral
2A	Secured Credit Card <i>Deposited funds are available in the event of default.</i>
9A	Secured Home Improvement
4D	Telecommunications/Cellular
0A	Time Share Loan <i>A purchased time share.</i>
01	Unsecured
92	Utility Company
25	Veteran's Administration (VA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>

## Exhibit 3

### Terms/Payment Amount Conversion to Monthly

The following table contains the calculations to be used to convert the Terms Duration (number of payment intervals) and Scheduled Monthly Payment Amount to monthly values.

<b>Terms Frequency Field 14</b>	<b>Terms Duration Field 13</b>	<b>Scheduled Monthly Payment Amount Field 15</b>
D = Deferred	Blank fill	Zero fill
P = Single Payment Loan	Blank fill	Zero fill
W = Weekly (Due every week)	Divide by 4.33	Multiply by 4.33
B = Biweekly (Due every 2 weeks)	Divide by 2.16	Multiply by 2.16
E = Semimonthly (Due twice a month)	Divide by 2	Multiply by 2
M = Monthly (Due every month)	As given	As given
L = Bimonthly (Due every 2 months)	Multiply by 2	Divide by 2
Q = Quarterly (Due every 3 months)	Multiply by 3	Divide by 3
T = Triannually (Due every 4 months)	Multiply by 4	Divide by 4
S = Semiannually (Due twice a year)	Multiply by 6	Divide by 6
Y = Annually (Due every year)	Multiply by 12	Divide by 12

**Note: Report whole dollars only in the Scheduled Monthly Payment Amount field.**

## Exhibit 4

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### Account Status Codes

Enter the Account Status Code (Field 17A) which best describes whether the account is current or past due as of the Date of Account Information (Field 24). If you have a status that is not described here, please contact your consumer reporting agencies.

Code	Description
05 <sup>1</sup>	Account transferred to another office.
11	Current account (0-29 days past the due date). For Installment and Mortgage loans, the account should be current and have a non-zero Balance Amount. For Credit Line, Open, and Revolving portfolio types, the account should be current and available for use. If the account is closed, but there is a balance due, Special Comment Code M or Compliance Condition Code XA should also be reported to indicate the account is no longer available for use.
13 <sup>1</sup>	Paid or closed account/zero balance. For Installment and Mortgage loans, the account should be paid with a zero Balance Amount. For Credit Line, Open, and Revolving portfolio types, the account should no longer be available for use, and the Balance Amount should be zero. A Special Comment Code M or Compliance Condition Code XA should also be reported to indicate the account is closed.
61	Account paid in full, was a voluntary surrender.
62	Account paid in full, was a collection account.
63	Account paid in full, was a repossession.
64	Account paid in full, was a charge-off.
65 <sup>1</sup>	Account paid in full. A foreclosure was started.
71	Account 30-59 days past the due date.
78	Account 60-89 days past the due date.
80	Account 90-119 days past the due date.
82	Account 120-149 days past the due date.
83	Account 150-179 days past the due date.
84	Account 180 days or more past the due date.
88 <sup>1</sup>	Claim filed with government for insured portion of balance on a defaulted loan.
89 <sup>1</sup>	Deed received in lieu of foreclosure on a defaulted mortgage.
93	Account assigned to internal or external collections.
94 <sup>1</sup>	Foreclosure completed/collateral sold to settle defaulted mortgage.

(continued)

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<sup>1</sup> Field 17B (Payment Rating) is also required when reporting this Account Status Code.

## Exhibit 4

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### Account Status Codes

Code	Description
95 <sup>1</sup>	Voluntary surrender. <b>Note: Do not report Status Code 95 for early termination of leases. Refer to the Leasing category within Exhibit 6 for applicable Special Comments.</b>
96	Merchandise was repossessed; there may be a balance due.
97	Unpaid balance reported as a loss (charge-off).
DA	Delete entire account (for reasons other than fraud). <b>Note: In order to maintain the integrity of credit information, it is important that data furnishers not ask for a subsequent deletion of account history unless an actual error was reported. Paid derogatory accounts, such as collections, should be reported as paid; they should not be deleted.</b>
DF	Delete entire account due to confirmed fraud (fraud investigation completed).

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<sup>1</sup> Field 17B (Payment Rating) is also required when reporting this Account Status Code.

## Exhibit 5

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### Examples of Reporting Payment History Profile (Field 18)

The Account Status, which is reported in field 17A of the Base Segment, contains the status of the account as of the current month being reported. Field 18 contains up to 24 months of consecutive history prior to the current month.

Examples of Account Status and Payment History Profile:

- A. Account Status Code = 11; Date of Account Information = 01/31/2005  
Field 18 = 000011000000EEEE0000BBBB

In the above example, field 18 data represents, from left to right, 12/31/2004 through 01/31/2003. The E's indicate that the account was current with a zero balance in 12/2003, 11/2003, 10/2003 and 09/2003. The B's indicate that no payment history was available prior to 05/2003, which was most likely the date the account was opened.

- B. Account Status Code = 80; Date of Account Information = 01/31/2005; Date of First Delinquency = 08/31/2004  
Field 18 = 2211100000DD000101000000

In the above example, field 18 data represents, from left to right, 12/31/2004 through 01/31/2003. The D's indicate that no payment history was available for 02/2004 or 01/2004.

- C. Account Status Code = 11; Date of Account Information = 01/31/2005  
Field 18 = EEEEEEEEE000EEEE0000EE00

In the above example, field 18 data represents, from left to right, 12/31/2004 through 01/31/2003. The E's indicate that the account was current with a zero balance from 12/2004 through 04/2004, from 12/2003 through 09/2003, and from 04/2003 to 03/2003. The account was current (and active) during the other months.

- D. Account Status Code = 97; Date of Account Information = 01/31/2005; Date of First Delinquency = 06/30/2003  
Field 18 = LLGGGGGGGG66654332100010

In the above example, field 18 data represents, from left to right, 12/31/2004 through 01/31/2003. The L's indicate that the account was a charge-off from 12/2004 through 11/2004, and the G's indicate that the account was a collection from 10/2004 through 03/2004.

**Note: The Date of First Delinquency (06/30/2003) represents the date of the 30-day delinquency that led to the status being reported.**

## Exhibit 6

### Special Comment Codes By Category within Portfolio

Category	Description	Credit Line	Installment	Mortgage	Open	Revolving
Closed (Permanently or Temporarily)	Election of Remedy	-	I	-	-	I
	Account Closed at Credit Grantor's Request	M	-	-	M	M
	Credit Line Suspended	AP	-	-	AP	AP
	Account Closed Due to Refinance (Refer to Frequently Asked Question 39 for reporting guidelines.)	AS	AS	AS	-	-
	Account Closed Due to Transfer	AT	AT	AT	AT	AT
	Credit Card Lost or Stolen (Refer to Frequently Asked Question 40 for reporting guidelines.)	-	-	-	BL	BL
Leasing	Full Termination/Status Pending (Requires Account Type 3A or 13)	-	BB	-	-	-
	Full Termination/Obligation Satisfied (Requires Account Type 3A or 13, Account Status Code 13 and Current Balance = 0)	-	BC	-	-	-
	Full Termination/Balance Owing (Requires Account Type 3A or 13. Refer to Frequently Asked Question 34 for reporting guidelines.)	-	BD	-	-	-
	Early Termination/Status Pending (Requires Account Type 3A or 13)	-	BE	-	-	-

(continued)

## Exhibit 6

### Special Comment Codes By Category within Portfolio

Category	Description	Credit Line	Installment	Mortgage	Open	Revolving
Leasing, continued	Early Termination/Obligation Satisfied (Requires Account Type 3A or 13, Account Status Code 13 and Current Balance = 0)	-	BF	-	-	-
	Early Termination/Balance Owing (Requires Account Type 3A or 13)	-	BG	-	-	-
	Early Termination/Insurance Loss (Requires Account Type 3A or 13)	-	BH	-	-	-
	Involuntary Repossession (Requires Account Type 3A or 13)	-	BI	-	-	-
	Involuntary Repossession/Obligation Satisfied (Requires Account Type 3A or 13)	-	BJ	-	-	-
	Involuntary Repossession/Balance Owing (Requires Account Type 3A or 13)	-	BK	-	-	-
	Prepaid Lease (Requires Account Type 3A or 13)	-	BS	-	-	-
Legal Action	Account Payments Assured by Wage Garnishment	AM	AM	AM	AM	AM

(continued)

## Exhibit 6

### Special Comment Codes By Category within Portfolio

Category	Description	Credit Line	Installment	Mortgage	Open	Revolving
Other	Special Handling - Contact Credit Grantor for Additional Information	S	S	S	S	S
	Adjustment Pending	V	V	V	V	V
	First Payment Never Received (May indicate fraudulent activity)	AV	AV	AV	AV	AV
	Affected by Natural or Declared Disaster	AW	AW	AW	AW	AW
	Redeemed Repossession	-	AZ	-	-	AZ
	Foreclosure Proceedings Started		-	BO	-	-
	Guaranteed/Insured	CH	CH	CH	CH	CH
	Used by <b>Child Support Agencies only</b> when reporting delinquent or collection accounts (No actual comment displays)	-	-	-	CS	-
Refinanced	Account Closed Due to Refinance (Refer to Frequently Asked Question 39 for reporting guidelines.)	AS	AS	AS	-	-
Removal of Comment	Removes Any Previously Reported Special Comment Code	BLANK	BLANK	BLANK	BLANK	BLANK

(continued)

## Exhibit 6

### Special Comment Codes By Category within Portfolio

Category	Description	Credit Line	Installment	Mortgage	Open	Revolving
Special Payment Arrangements	Account Payments Managed by Financial Counseling Program	B	B	B	B	B
	Paid by Co-Maker or Guarantor (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	C	C	C	C	C
	Debt Being Paid Through Insurance (Account Status Code should <b>not</b> be 13 or 61-65)	AB	AB	AB	AB	AB
	Paying Under a Partial Payment Agreement (Account Status Code should <b>not</b> be 13 or 61-65)	AC	AC	AC	AC	AC
	Simple Interest Loan	-	AG	AG	-	-
	Recalled to Active Military Duty	AI	AI	AI	AI	AI
	Payroll Deduction	AJ	AJ	AJ	AJ	AJ
	Voluntarily Surrendered, then Redeemed	-	AO	-	-	AO
	Account Paid in Full for Less than the Full Balance (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	AU	AU	AU	AU	AU
	Account Paid from Collateral (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	AX	AX	-	-	AX

(continued)

## Exhibit 6

### Special Comment Codes By Category within Portfolio

Category	Description	Credit Line	Installment	Mortgage	Open	Revolving
Special Payment Arrangements, continued	Paid by Company which Originally Sold the Merchandise (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	-	BN	-	-	-
	Paid through Insurance (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	BP	BP	BP	BP	BP
	Principal Deferred/Interest Payment Only	BT	BT	BT	-	BT
Transferred	Account Closed Due to Transfer	AT	AT	AT	AT	AT
	Loan Assumed by Another Party (Requires ECOA Code T — Terminated)	-	H	H	-	-
	Account Transferred to Another Lender	O	O	O	O	O
	Purchased by Another Lender	AH	AH	AH	AH	AH
	Student Loan — Permanently Assigned to Government	-	AL	-	-	-
	Account Acquired by FDIC/NCUA	AN	AN	AN	AN	AN
	Transferred to Recovery (Requires Account Status Code 71-97)	BA	BA	BA	BA	BA

## Exhibit 7

### Special Comment Codes

The Special Comment Code (Field 19) should be reported as long as the condition applies.

Code	Description
Blank	Removes any previously reported Special Comment Code.
B	Account payments managed by financial counseling program.
C	Paid by Co-maker or Guarantor. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
H	Loan assumed by another party. <i>Requires ECOA Code T (Terminated).</i>
I	Election of remedy. <i>Definition: A car or other item is repossessed, but the value is less than the balance due. The credit grantor must consider the account paid and cannot collect the difference in the amounts.</i>
M	Account closed at credit grantor's request.
O	Account transferred to another lender.
S	Special handling. Contact credit grantor for additional information.
V	Adjustment pending. <i>Definition: Account adjustment, such as returned merchandise and refund due.</i>
AB	Debt being paid through insurance. <i>Account Status Code should <b>not</b> be 13 or 61-65.</i>
AC	Paying under a partial payment agreement. <i>Account Status Code should <b>not</b> be 13 or 61-65.</i>
AG	Simple interest loan. <i>Definition: Any loan where interest is compounded daily.</i>
AH	Purchased by another lender.
AI	Recalled to active military duty.
AJ	Payroll deduction.
AL	Student loan permanently assigned to government.
AM	Account payments assured by wage garnishment.
AN	Account acquired by FDIC/NCUA. <i>Definition: Federal Deposit Insurance Corp./National Credit Union Administration.</i>

(continued)

## Exhibit 7

### Special Comment Codes

Code	Description
AO	Voluntarily surrendered - then redeemed.
AP	Credit Line suspended. <i>Definition: The credit line is temporarily unavailable for use.</i>
AS	Account closed due to refinance. <i>Refer to Frequently Asked Question 39 for reporting guidelines.</i>
AT	Account closed due to transfer. <i>Note: Used for internal transfers.</i>
AU	Account paid in full for less than the full balance. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
AV	First payment never received. <i>Comment: May indicate fraudulent activity.</i>
AW	Affected by natural or declared disaster.
AX	Account paid from collateral. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
AZ	Redeemed repossession.
BA	Transferred to Recovery. <i>Requires Account Status Code 71 - 97.</i>
BB	Full termination/status pending. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BC	Full termination/obligation satisfied. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease), Account Status Code 13 and Current Balance = 0.</i>
BD	Full termination/balance owing. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BE	Early termination/status pending. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BF	Early termination/obligation satisfied. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease), Account Status Code 13 and Current Balance = 0.</i>
BG	Early termination/balance owing. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BH	Early termination/insurance loss. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>

(continued)

## Exhibit 7

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### Special Comment Codes

Code	Description
BI	Involuntary repossession. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BJ	Involuntary repossession/obligation satisfied. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BK	Involuntary repossession/balance owing. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i>
BL	Credit card lost or stolen. <i>Refer to Frequently Asked Question 40 for reporting guidelines.</i>
BN	Paid by company which originally sold the merchandise. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
BO	Foreclosure proceedings started.
BP	Paid through insurance. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
BS	Prepaid lease. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i> <i>Definition: Consumer paid lease in advance. No monthly payments are due.</i>
BT	Principal deferred/Interest payment only.
CH	Guaranteed/Insured
CS	Used by <b>Child Support Agencies only</b> when reporting delinquent or collection accounts. (No actual comment displays.)

**Note:** For comments specific to disputes and accounts closed at consumer's request, refer to the Compliance Condition Code (Field 20).

## Exhibit 8

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### **Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)**

**PURPOSE:** This date will be used by the consumer reporting agencies to determine when delinquent data is to be deleted, pursuant to the Fair Credit Reporting Act (FCRA).

**HOW TO REPORT:** For Account Status Codes 61-65, 71, 78, 80, 82-84, 88-89 and 93-97, report the date of the first delinquency that led to the status being reported. If a delinquent account becomes current, the Date of First Delinquency should be zero filled. Then if the account goes delinquent again, the Date of First Delinquency starts over with the new first delinquency date.

For Account Status Codes 05 and 13, if the Payment Rating is 1-6, G or L, report the date of the first delinquency that led to the Payment Rating being reported.

For Consumer Information Indicators A-H and Z (Bankruptcies), 1A (Personal Receivership) and V-Y (Reaffirmation of Debt Rescinded with Bankruptcy Chapters), if the account is current (Account Status Code 11 or Account Status Code 05 or 13 with Payment Rating 0), report the date of the bankruptcy/personal receivership notification. Even though the account is not delinquent, this date is required for purging purposes.

The following pages contain three step-by-step examples on how to report FCRA Compliance/Date of First Delinquency.

## Exhibit 8

### Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

**Example 1:** Displays an account that goes delinquent to current and then goes delinquent again.

Date of Account Information (Field 24)	Due Date (Not reported)	Payments Missed	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/11/2005	12/20/2004	None	11 Current	Zero fill
02/11/2005	01/20/2005	None	11 Current	Zero fill
03/11/2005	02/20/2005	January payment not made	71 30–59 days past the due date	02/20/2005 (First Delinquency)
04/11/2005	03/20/2005	Jan. & Feb. payments not made	78 60-89 days past the due date	02/20/2005
05/11/2005	04/20/2005	None – payments caught up	11 Current	Zero fill
06/11/2005	05/20/2005	April payment not made	71 30-59 days past the due date	05/20/2005 (First Delinquency)
07/11/2005	06/20/2005	April & May payments not made	78 60-89 days past the due date	05/20/2005
08/11/2005	07/20/2005	April, May, June payments not made	80 90-119 days past the due date	05/20/2005
09/11/2005	08/20/2005	April → July payments not made	97 Charge-off	05/20/2005

(continued)

## Exhibit 8

### Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

**Example 2:** Displays an account that goes delinquent and never returns to a current status.

Date of Account Information (Field 24)	Due Date (Not reported)	Payments Missed	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/11/2005	12/20/2004	None	11 Current	Zero fill
02/11/2005	01/20/2005	None	11 Current	Zero fill
03/11/2005	02/20/2005	January payment not made	71 30–59 days past the due date	02/20/2005 (First Delinquency)
04/11/2005	03/20/2005	January payment made, but February payment not made	71 30–59 days past the due date	02/20/2005
05/11/2005	04/20/2005	February payment made, but March payment not made	71 30–59 days past the due date	02/20/2005
06/11/2005	05/20/2005	March & April payments not made	78 60-89 days past the due date	02/20/2005
07/11/2005	06/20/2005	March → May payments not made	80 90-119 days past the due date	02/20/2005
08/11/2005	07/20/2005	March → June payments not made	97 Charge-off	02/20/2005
09/11/2005	08/20/2005	All payments made	64 Paid Charge-off	02/20/2005

(continued)

## Exhibit 8

### Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

**Example 3:** Displays an account that has rolling delinquencies.

Date of Account Information (Field 24)	Due Date (Not reported)	Payments Missed	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/11/2005	12/20/2004	None	11 Current	Zero fill
02/11/2005	01/20/2005	December payment not made	71 30-59 days past the due date	01/20/2005 (First delinquency)
03/11/2005	02/20/2005	December payment made, but January payment not made	71 30-59 days past the due date	01/20/2005
04/11/2005	03/20/2005	Jan. & Feb. payments not made	78 60-89 days past the due date	01/20/2005
05/11/2005	04/20/2005	Jan. → March payments not made	80 90-119 days past the due date	01/20/2005
06/11/2005	05/20/2005	Jan. → Mar. payments made, but April payment not made	71 30-59 days past the due date	01/20/2005
07/11/2005	06/20/2005	April payment made, but May payment not made	71 30-59 days past the due date	01/20/2005
08/11/2005	07/20/2005	May & June payments not made	78 60-89 days past the due date	01/20/2005

(continued)

## Exhibit 8

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### **Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)**

#### **Fair Credit Reporting Act Excerpts**

##### **Section 605(c) Running of Reporting Period:**

(1) In general: The 7-year period referred to in paragraphs (4) and (6) of subsection (a) shall begin, with respect to any delinquent account that is placed for collection (internally or by referral to a third party, whichever is earlier), charged to profit and loss, or subjected to any similar action, upon the expiration of the 180-day period beginning on the date of the commencement of the delinquency which immediately preceded the collection activity, charge to profit and loss, or similar action.

##### **Section 605(a) Information Excluded From Consumer Reports:**

(4) Accounts placed for collection or charged to profit and loss which antedate the report by more than seven years.

(5) Any other adverse item of information, other than records of convictions or crimes which antedates the report by more than seven years.

(continued)

## Exhibit 8

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# Explanation and Examples of FCRA Compliance/ Date of First Delinquency (Field 25)

### Fair Credit Reporting Act Excerpts

#### Section 623 Responsibilities of Furnishers of Information to Consumer Reporting Agencies:

(5) Duty to provide notice of delinquency of accounts.

(A) In general. - A person who furnishes information to a consumer reporting agency regarding a delinquent account being placed for collection, charged to profit or loss, or subjected to any similar action, shall, not later than 90 days after furnishing the information, notify the agency of the date of delinquency on the account, which shall be the month and year of the commencement of the delinquency on the account that immediately preceded the action.

(B) Rule of construction.-For purposes of this paragraph only, and provided that the consumer does not dispute the information, a person that furnishes information on a delinquent account that is placed for collection, charged for profit or loss, or subjected to any similar action, complies with this paragraph, if-

(i) the person reports the same date of delinquency as that provided by the creditor to which the account was owed at the time at which the commencement of the delinquency occurred, if the creditor previously reported that date of delinquency to a consumer reporting agency;

(ii) the creditor did not previously report the date of delinquency to a consumer reporting agency, and the person establishes and follows reasonable procedures to obtain the date of delinquency from the creditor or another reliable source and reports that date to a consumer reporting agency as the date of delinquency; or

(iii) the creditor did not previously report the date of delinquency to a consumer reporting agency and the date of delinquency cannot be reasonably obtained as provided in clause (ii), the person establishes and follows reasonable procedures to ensure the date reported as the date of delinquency precedes the date on which the account is placed for collection, charged to profit or loss, or subjected to any similar action, and reports such date to the credit reporting agency.

## Exhibit 9

### Consumer Information Indicators

The Consumer Information Indicator (CII), which is reported in Field 38 of the Base Segment, Field 11 of the J1 Segment, and Field 11 of the J2 Segment, contains a value that indicates a special condition that applies to the specific consumer. The Consumer Information Indicator must be reported only on the consumer to whom the information applies.

Report the following values:

Code	Description
BLANK	Retains previously reported value, or no new Consumer Information Indicator applies for this activity period
A	Petition for Chapter 7 Bankruptcy
B	Petition for Chapter 11 Bankruptcy
C	Petition for Chapter 12 Bankruptcy
D	Petition for Chapter 13 Bankruptcy
E	Discharged through Bankruptcy Chapter 7
F	Discharged through Bankruptcy Chapter 11
G	Discharged through Bankruptcy Chapter 12
H	Completed through Bankruptcy Chapter 13
I	Chapter 7 Bankruptcy Dismissed
J	Chapter 11 Bankruptcy Dismissed
K	Chapter 12 Bankruptcy Dismissed
L	Chapter 13 Bankruptcy Dismissed
M	Chapter 7 Bankruptcy Withdrawn
N	Chapter 11 Bankruptcy Withdrawn
O	Chapter 12 Bankruptcy Withdrawn
P	Chapter 13 Bankruptcy Withdrawn
Z	Bankruptcy – Undesignated Chapter <b>Note: Report indicators with specific bankruptcy chapters, when known.</b>
1A	Personal Receivership
Q	Removes previously reported Bankruptcy Indicator (A through P and Z) or Personal Receivership Indicator (1A) <b>Note: Do not report Q as a default value. If no new CII applies in the current activity period, blank fill this field.</b>

(continued)

## Exhibit 9

### Consumer Information Indicators

Code	Description
R	Reaffirmation of Debt
V	Chapter 7 Reaffirmation of Debt Rescinded
W	Chapter 11 Reaffirmation of Debt Rescinded
X	Chapter 12 Reaffirmation of Debt Rescinded
Y	Chapter 13 Reaffirmation of Debt Rescinded
S	Removes previously reported Reaffirmation of Debt and Reaffirmation of Debt Rescinded Indicators (R, V, W, X, Y) <b>Note: Do not report S as a default value. If no new CII applies in the current activity period, blank fill this field.</b>
T	Credit Grantor Cannot Locate Consumer
U	Consumer Now Located (Removes previously reported T Indicator) <b>Note: Do not report U as a default value. If no new CII applies in the current activity period, blank fill this field.</b>

**Note:** When converting from Metro to Metro 2, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2 submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro submission.

#### Examples of reporting Consumer Information Indicators:

##### Example 1:

Date of Account Information	CII	Action
03/15/2006	A	A is added to file.
04/15/2006	Blank	A is retained.
05/15/2006	E	A is replaced with E.
06/15/2006	Blank	E is retained.

##### Example 2:

Date of Account Information	CII	Action
03/15/2006	D	D is added to file.
04/15/2006	Blank	D is retained.
05/15/2006	Blank	D is retained.
06/15/2006	Q	D is removed.

**Note:** The removal value **Q** is used to remove the **D**, which in this case, was reported in error.

# Exhibit 10

## Country Codes

<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>
Afghanistan	AF	Central African		Greece	GR
Albania	AN	Republic	CF	Greenland	GE
Algeria	DZ	Chad	CD	Guadeloupe	GP
Andorra	AD	Chile	CL	Guatemala	GT
Angola	AO	China (Peking)	CP	Guinea	GN
Anguilla	AI	Colombia	CB	Guinea-Bissau	GW
Antigua & Barbuda	AG	Comoros	CJ	Guyana	GY
Argentina	AT	Congo	CG	Haiti	HA
Armenia	RM	Corsica	CC	Honduras	HN
Aruba	AW	Costa Rica	CR	Hungary	HU
Ascension	AS	Croatia	HX	Iceland	IS
Australia	AU	Cuba	HR	India	IB
Austria	DF	Cyprus	CY	Indonesia	IF
Azerbaijan	AJ	Czech Republic	CZ	Iran	IR
Azores	AX	Democratic Republic		Iraq	IQ
Bahamas	BS	of Congo	ZR	Ireland	IE
Bahrain	BH	Denmark	DK	Israel	IG
Bangladesh	BD	Djibouti	DJ	Italy	IT
Barbados	BB	Dominica	DM	Ivory Coast	IC
Belarus	BL	Dominican		Jamaica	JM
Belgium	BE	Republic	DO	Japan	JP
Belize	BZ	East Timor	EM	Jordan	JO
Benin	BJ	Ecuador	EC	Kazakhstan	KZ
Bermuda	BU	Egypt	EG	Kenya	KE
Bhutan	BM	El Salvador	SV	Kiribati	KI
Bolivia	BO	Equatorial Guinea	GQ	Korea (North)	KX
Bosnia &		Eritrea	ER	Korea (South)	KR
Herzegovina	BX	Estonia	SU	Kuwait	KW
Botswana	BW	Ethiopia	ET	Kyrgyzstan	KG
Brazil	BR	Falkland Islands	FA	Laos	LO
British Virgin		Faroe Islands	FE	Latvia	LX
Islands	VG	Fiji	FJ	Lebanon	LB
Brunei	BN	Finland	FI	Leeward Islands	LE
Bulgaria	BG	France	FR	Lesotho	LS
Burkina Faso	BF	French Guiana	GF	Liberia	LR
Burundi	BI	French Polynesia	FP	Libya	LV
Cambodia	KA	Gabon	GB	Liechtenstein	CH
Cameroon	CM	Gambia	GM	Lithuania	LT
Canada	CN	Germany	DW	Luxembourg	LU
Cape Verde	CV	Ghana	GH		
Carriacou	CU	Gibraltar	GI	(continued)	
Cayman Islands	CI	Granada	GD		

# Exhibit 10

## Country Codes

<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>	<u>COUNTRY</u>	<u>CODE</u>
Macao	MJ	Republic of		Trinidad & Tobago	TT
Macedonia	MH	Georgia	GX	Tristan da Cunha	TD
Madagascar	MG	Reunion Island	RE	Tunisia	TU
Madeira	MB	Romania	RO	Turkey	TR
Malawi	MW	Russia	RU	Turkmenistan	TM
Malaysia	MY	Rwanda	RW	Turks & Caicos	
Maldives	MV	Saint Helena	SH	Islands	TC
Mali	ML	Saint Kitts & Nevis	KN	Tuvalu	TV
Malta	MF	Saint Lucia	LC	Uganda	UG
Martinique	MQ	Saint Pierre &		Ukraine	UA
Mauritania	MR	Miquelon	SP	Union of Myanmar	
Mauritius	MU	Saint Vincent & the		(Burma)	BK
Mexico	MX	Grenadines	SF	United Arab	
Moldova	LD	San Marino	SM	Emirates	UM
Monaco	AC	Santa Cruz Islands	ST	United Kingdom	UK
Mongolia	MC	Sao Tome &		United States	US
Montserrat	MK	Principe	MP	Uruguay	UY
Morocco	RC	Saudi Arabia	SA	Uzbekistan	UZ
Mozambique	MZ	Senegal	SN	Vanuatu	VU
Namibia	NB	Serbia and	SX	Vatican City State	VC
Nauru	NA	Montenegro		Venezuela	VE
Nepal	NP	Seychelles	YC	Vietnam	VN
Netherlands		Sierra Leone	SL	Wallis/Futuna	
Antilles	NN	Singapore	SG	Island	WT
Netherlands	NL	Slovakia	VK	Western Samoa	WS
New Caledonia	NW	Slovenia	XN	Yemen	YE
New Zealand	NZ	Solomon Islands	SI	Zambia	ZM
Nicaragua	NI	Somalia	SO	Zimbabwe	ZW
Niger	NR	South Africa	ZA		
Nigeria	NG	Spain	ES		
Norway	NO	Sri Lanka	LK		
Oman	OM	Sudan	SB		
Pakistan	PK	Suriname	SR		
Panama	PM	Swaziland	SZ		
Papua New		Sweden	SE		
Guinea	PG	Switzerland	SW		
Paraguay	PY	Syria	SY		
Peru	PU	Tadzhikistan	TK		
Philippines	PH	Taiwan	TW		
Pitcairn Islands	PS	Tanzania	TZ		
Poland	PL	Thailand	TH		
Portugal	PT	Togo	TG		
Qatar	QA	Tonga	TA		

# Exhibit 11

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## General Rules for Addresses

Most addresses consist of a street address, containing a street number, street name, street type, city name (spelled out), state code and postal/zip code. Include the complete address on all records; the absence of an address may cause a record to be bypassed.

Do not report non-address information in the Address fields.

Examples: Do not report a spouse name in the Address field.  
Do not report account description terminology, such as Fraud, Bankrupt, Charge-off, etc. in the Address field.

Slashes, dashes and periods are acceptable in the delivery address line. For accurate reporting of addresses, refer to the U.S. Postal Service website at [www.usps.com](http://www.usps.com) for address standards.

Use the standard postal abbreviations for state names, such as MS for Mississippi. Refer to Exhibit 12 for a complete list of State Codes.

**Note: The Address Indicator (Field 45 in the Base Segment and Field 18 in the J2 Segment) should be used to designate what address is being reported.**

### Military Addresses

The standard format for Military Addresses (APO/FPO Addresses) is:

PSC (CMR or UNIT) NNNNN  
BOX NNNN or SHIP'S NAME  
CITY (APO/FPO), STATE (AE, AP OR AA), ZIP CODE

Currently, the largest unit number is 5 digits long.

The U.S. Postal Service designates the state code for military addresses as follows:

- AE – Armed Forces in Europe, Africa, Middle East and Canada
- AA – Armed Forces in the Americas, excluding Canada
- AP – Armed Forces in the Pacific

All domestic military mail must have the conventional street style addresses.

# Exhibit 12

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## State Codes

<u>STATE</u>	<u>CODE</u>	<u>STATE</u>	<u>CODE</u>
Alabama	AL	North Dakota	ND
Alaska	AK	Northern Mariana Islands	MP
American Samoa	AS	Ohio	OH
Arizona	AZ	Oklahoma	OK
Arkansas	AR	Oregon	OR
California	CA	Palau	PW
Colorado	CO	Pennsylvania	PA
Connecticut	CT	Puerto Rico	PR
Delaware	DE	Rhode Island	RI
District of Columbia	DC	South Carolina	SC
Federated States of Micronesia	FM	South Dakota	SD
Florida	FL	Tennessee	TN
Georgia	GA	Texas	TX
Guam	GU	Utah	UT
Hawaii	HI	Vermont	VT
Idaho	ID	Virginia	VA
Illinois	IL	Virgin Islands	VI
Indiana	IN	Washington	WA
Iowa	IA	West Virginia	WV
Kansas	KS	Wisconsin	WI
Kentucky	KY	Wyoming	WY
Louisiana	LA		
Maine	ME	Military in the Americas other than Canada	AA
Marshall Islands	MH		
Maryland	MD		
Massachusetts	MA	Military in Europe, Middle East, Africa, Canada	AE
Michigan	MI		
Minnesota	MN		
Mississippi	MS		
Missouri	MO	Military in the Pacific Theater	AP
Montana	MT		
Nebraska	NE		
Nevada	NV		
New Hampshire	NH		
New Jersey	NJ		
New Mexico	NM		
New York	NY		
North Carolina	NC		











## 426 FORMAT - DATA RECORD (FIXED LENGTH) CONTINUED

```
CHAR  ID NUMBER      N1EMPLOYER NAME      1ST LINE OF EMPLOYER ADDRESS  2ND LINE OF EMPLOY
ZONE  4CC4DEDCCD4444444DFCDDDECD4DCDC444444444444444444444444FEE4DCDC4DC4CDDDECD4CCCDCEE4444FDC4DCDC4DC4CDDDE
NUMR  0940544259000000005154736859051450000000000000000012303955066054736859014495220000254039550660547368
    1201...5...10...15...20...25...30...35...40...45...50...55...60...65...70...75...80...85...90...95.....
CHAR  ER ADDRESS     EMPLOYER CITY        ST123451234OCCUPATION
ZONE  CD4CCCDCEE4444CDDDECD4CCEE44444444EEFFFFFFFFFDCCEDCECDD444444444
NUMR  5901449522000054736859039380000000231234512346334713965000000000
    1301...5...10...15...20...25...30...35...40...45...50...55...60...6
```

See Attachment for Segment definitions.

(continued)



# ATTACHMENT - SEGMENT DEFINITIONS

## J1 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3 = Consumer Transaction Type  
Pos. 4- 28 = Surname  
Pos. 29- 48 = First Name  
Pos. 49- 68 = Middle Name  
Pos. 69 = Generation Code  
Pos. 70- 78 = Social Security Number  
Pos. 79- 86 = Date Of Birth  
Pos. 87- 96 = Telephone Number  
Pos. 97 = ECOA Code  
Pos. 98- 99 = Consumer Information Indicator  
Pos. 100 = Reserved

## J2 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3 = Consumer Transaction Type  
Pos. 4- 28 = Surname  
Pos. 29- 48 = First Name  
Pos. 49- 68 = Middle Name  
Pos. 69 = Generation Code  
Pos. 70- 78 = Social Security Number  
Pos. 79- 86 = Date Of Birth  
Pos. 87- 96 = Telephone Number  
Pos. 97 = ECOA Code  
Pos. 98- 99 = Consumer Information Indicator  
Pos. 100-101 = Country Code  
Pos. 102-133 = First Line of Address  
Pos. 134-165 = Second Line of Address  
Pos. 166-185 = City  
Pos. 186-187 = State  
Pos. 188-196 = Postal/Zip Code  
Pos. 197 = Address Indicator  
Pos. 198 = Residence Code  
Pos. 199-200 = Reserved

## K1 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3-32 = Original Creditor Name  
Pos. 33-34 = Creditor Classification

## K2 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3 = Portfolio Indicator  
Pos. 4-33 = Purchased Portfolio or Sold To Name  
Pos. 34 = Reserved

## K3 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3- 4 = Agency Identifier  
Pos. 5-22 = Account Number  
Pos. 23-40 = Mortgage Identification Number

## K4 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3- 4 = Specialized Payment Indicator  
Pos. 5-12 = Deferred Payment Start Date  
Pos. 13-20 = Payment Due Date  
Pos. 21-29 = Payment Amount  
Pos. 30 = Reserved

## L1 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3 = Change Indicator  
Pos. 4-33 = New Account Number  
Pos. 34-53 = New Identification Number  
Pos. 54 = Reserved

## N1 Segment

Pos. 1- 2 = Segment Identifier  
Pos. 3- 32 = Employer Name  
Pos. 33- 64 = First Line of Employer Address  
Pos. 65- 96 = Second Line of Employer Address  
Pos. 97-116 = Employer City  
Pos. 117-118 = Employer State  
Pos. 119-127 = Employer Postal/Zip Code  
Pos. 128-145 = Occupation  
Pos. 146 = Reserved

# Exhibit 14

## Compliance Condition Codes

The Compliance Condition Code (CCC), which is reported in Field 20 of the Base Segment, allows the reporting of a condition that is required for legal compliance; e.g., according to the Fair Credit Reporting Act (FCRA) or Fair Credit Billing Act (FCBA).

Report the following values:

Code	Description
Blank	Retains previously reported value, or no new Compliance Condition Code applies for this activity period
XA	Account closed at consumer's request
XB	Account information disputed by consumer under the Fair Credit Reporting Act
XC	Completed investigation of FCRA dispute — consumer disagrees
XD	Account closed at consumer's request and in dispute under FCRA
XE	Account closed at consumer's request and dispute investigation completed, consumer disagrees. (To be used for FCRA or FCBA disputes)
XF	Account in dispute under Fair Credit Billing Act
XG	FCBA Dispute resolved — consumer disagrees
XH	Account previously in dispute — now resolved, reported by data furnisher (To be used for FCRA or FCBA disputes)
XJ	Account closed at consumer's request and in dispute under FCBA
XR	Removes the most recently reported Compliance Condition Code <b>Note: Do not use XR as a default value. If no Compliance Condition Code applies in the current activity period, blank fill this field.</b>

The code should be reported one time and will be deleted only when another Compliance Condition Code or the **XR** (Remove value) is reported. Example:

Date of Account Information	CCC	Action
03/15/2006	XB	XB is added to file.
04/15/2006	Blank	XB is retained.
05/15/2006	Blank	XB is retained.
06/15/2006	Blank	XB is retained.
07/15/2006	XC	XB is replaced with XC.
08/15/2006	Blank	XC is retained.
09/15/2006	XR	XC is removed.

**Note: When converting from Metro to Metro 2, it is necessary to report the applicable Compliance Condition Code on your first Metro 2 submission, even if you had reported this information through a Special Comment on your last Metro submission.**

# Frequently Asked Questions and Answers

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## Segments and Appendages (6-4)

1. How is the Base Segment used?
2. What if we don't currently capture data for a specific field in our system?
3. How are the J1 and J2 Segments used?
4. When reporting fixed-length records, can the J2 segment be reported for all consumers, whether they live at the same or different address as the primary borrower? If the address is the same, can the address fields be blank?
5. How is the L1 Segment used?
6. How are fixed-length records reported if no appendage (e.g., J1, J2) information is available?
7. How are variable-length records reported if no appendage (e.g., J1, J2) information is available?

## BDW / RDW (6-6)

8. What is the BDW and how is it used?
9. What is the RDW and how is it used?

## Delinquency Reporting (6-6)

10. How are delinquencies calculated?

## Cycle Reporting (6-6)

11. When is cycle reporting appropriate, versus month-end reporting?

## Account Status, Payment Rating, Special Comment (6-7)

12. How do Account Statuses, Payment Ratings and Special Comments interact?

## ECOA Requirements (6-7)

13. How do I comply with ECOA?
14. How is an ECOA change reported?

## FCRA Requirements (6-8)

15. How do I comply with the reporting requirements of the Fair Credit Reporting Act?
16. The Fair Credit Reporting Act requires certain information to be reported with regard to returned checks. What are those requirements?

(continued)

# Frequently Asked Questions and Answers

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## Deleting Accounts/Borrowers (6-9)

17. How can an account, or a specific borrower, be deleted from the consumer reporting agencies' files?

## Consumer Information (6-10)

18. How should a new borrower be added to an existing account?
19. How should a consumer's association with an existing account be terminated?
20. How should deceased borrowers be reported?
21. How should a business account be reported when a consumer is personally liable?

## Duplicate Tradelines (6-11)

22. What causes duplicate tradelines?

## Media (6-11)

23. What types of media are acceptable?
24. Does a carriage return on a diskette prevent processing?

## First Time Reporters (6-12)

25. Are there any special reporting requirements for a first time reporter when sending data to the consumer reporting agencies?

## Reporting Scenarios (6-13)

26. When and how should Debit Cards be reported?
27. Is there a preferred method of reporting when accounts are completely or partially reaffirmed in bankruptcy?
28. What Account Status Code should be reported with the Bankruptcy Consumer Information Indicators?
29. How should a joint account be reported when one borrower filed Bankruptcy Chapter 13 and the other borrower did not?
30. How should an account included in bankruptcy be reported if a "Relief from Stay" is granted to the creditor?
31. How should bankruptcies be reported when the consumer voluntarily surrenders the merchandise or redeems the merchandise?
32. Is there a preferred method of reporting when an account is partially charged off?

(continued)

# Frequently Asked Questions and Answers

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## Reporting Scenarios - continued (6-16)

33. If a credit card is temporarily unavailable for use because the credit grantor is conducting an investigation, how should the account be reported?
34. How should an account be reported when an auto lease is paid in full, yet there are over mileage charges, excess wear and tear charges, or other outstanding charges on the account?
35. How should settled accounts be reported?
36. How should a paid in full, closed account be reported?
37. How should a closed account be reported that has an outstanding balance?
38. How long should paid accounts (Account Status Code 13, 61-65) continue to be reported?
39. How should a refinanced/renewed loan be reported?
40. How should lost or stolen credit cards be reported?
41. How should deferred loans be reported?
42. How should accounts that have been sold to another lender be reported?
43. How are "payment reversal" transactions handled when reporting Date of Last Payment, Date of First Delinquency, Payment History Profile and Actual Payment Amount?
44. Consumer loans may have multiple payment schedules, which may each have different payment frequencies (e.g., principal amount due annually and interest amount due monthly). How should these loans be reported?
45. How should credit cards that have both revolving and open terms be reported?
46. How should the different stages of foreclosure be reported?

# Frequently Asked Questions and Answers

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## SEGMENTS AND APPENDAGES

### 1. Question: How is the Base Segment used?

Answer: The Base Segment of the Metro 2 Format is used to report the identification information for the primary borrower, as well as all of the pertinent account information, such as Date Opened, High Credit, Current Balance and Account Status.

### 2. Question: What if we don't currently capture data for a specific field in our system?

Answer: Refer to Record Layouts within the Metro 2 Format section for designated Required Fields.

If you have a question about a specific field that is not on your system, contact all the consumer reporting agencies to determine if that field is required. Some fields must be reported to comply with legislative requirements, while others are used to make the reported data complete and accurate.

### 3. Question: How are the J1 and J2 Segments used?

Answer: In general, appendages in the Metro 2 Format are designed to allow the data furnisher to report additional information about the account by adding the appropriate appendages to the end of the Base Segment. Two segments: J1 and J2 are used in reporting the names and addresses (if different from the primary borrower) of individuals who are associated with the account.

- The J1 Segment is used to report a consumer who is associated with the account who lives at the same address as the individual reported in the Base Segment.
- The J2 Segment is used to report a consumer who is associated with the account and who lives at the same or different address from the individual reported in the Base Segment.

# Frequently Asked Questions and Answers

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4. **Question: When reporting fixed-length records, can the J2 Segment be reported for all consumers, whether they live at the same or different address as the primary borrower? If the address is the same, can the address fields be blank?**

Answer: If you are reporting fixed-length records, you may choose to report only J2 Segments for all associated consumers. In that case, the J2 Segments must always contain addresses, even if the addresses are the same as those reported in the Base Segments.

5. **Question: How is the L1 Segment used?**

Answer: The L1 Segment is used to report a new Account Number or a new Identification Number in situations when one or both of these numbers has changed since the last reporting period. The Change Indicator field in the L1 Segment specifies whether the change is to the Account Number, the Identification Number or both.

The old Account Number is reported in the Consumer Account Number field of the Base Segment and the new Account Number is reported in the New Consumer Account Number field of the L1 Segment. The old Identification Number is reported in the Identification Number field of the Base Segment and the new Identification Number is reported in the New Identification Number field of the L1 Segment.

The L1 Segment should be reported at the time of the Account Number/Identification Number change and should be reported only once. The following month, the new numbers should appear in the Base Segment.

6. **Question: How are fixed-length records reported if no appendage (e.g., J1, J2) information is available?**

Answer: If no information is available for the appendages, provide the Segment Identifier (e.g., J1, J2) and blank fill the remainder of the segment.

7. **Question: How are variable-length records reported if no appendage (e.g., J1, J2) information is available?**

Answer: Do not report the appendage.

# Frequently Asked Questions and Answers

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## BDW / RDW

### 8. Question: What is the BDW and how is it used?

Answer: For variable-length blocks, the Block Descriptor Word (BDW) is typically systems-generated and contains a value equal to the length of each block of data. The BDW must be reported when using the packed format or when reporting variable length records. The BDW is used internally by each consumer reporting agency's system to determine the number of bytes in each block.

### 9. Question: What is the RDW and how is it used?

Answer: The Record Descriptor Word (RDW) contains a value equal to the number of bytes in each record. A data record includes the Base Segment and any appendages (e.g., J1, K1, N1).

The RDW is a required field and may be systems-generated by the data furnisher's system. If not, it must be hard-coded in the program.

The RDW is used internally by each consumer reporting agency's system to determine the number of bytes in each data record.

## DELINQUENCY REPORTING

### 10. Question: How are delinquencies calculated?

Answer: Delinquencies should be calculated from the due date. For consumer reporting purposes, an account is not deemed to be delinquent until it is at least 30 days (Account Status Code 71) past the due date.

## CYCLE REPORTING

### 11. Question: When is cycle reporting appropriate, versus month-end reporting?

Answer: Cycle reporting is generally appropriate when the data furnisher has multiple billing cycles. Reporting would take place at the end of each billing cycle, resulting in more accurate and current reporting of account statuses.

# Frequently Asked Questions and Answers

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## ACCOUNT STATUS, PAYMENT RATING, SPECIAL COMMENT

### 12. Question: How do Account Statuses, Payment Ratings and Special Comments interact?

Answer: The Account Status (Field 17A) is used to report the current condition of the accounts, such as current or 30 days past the due date. The Payment Rating (Field 17B), which is required for certain Account Statuses, is used to report whether the account is current, past due, in collections or charged off within the activity period being reported. The Special Comment (Field 19) is used to provide additional information about the account. These codes are used together to provide a complete picture of the account.

Examples:

- An account is reported with Account Status Code 80 (90 days past the due date) and Special Comment M (Account closed at credit grantor's request). Since both codes are reported, credit grantors know the current condition of the account, and that the account is closed to further charges, at the credit grantor's request.
- An account is reported with Account Status Code 13 (Paid), Payment Rating 3 (90 days past the due date) and Special Comment AU (Account paid in full for less than the full balance). This combination of codes provides complete information for credit grantors: the account is paid, the consumer was 90 days past the due date during the final month and the account was settled for less than the full balance.

## ECOA REQUIREMENTS

### 13. Question: How do I comply with ECOA?

Answer: While ECOA requires only the reporting of spouse information, industry practices encourage the reporting of all consumers associated with an account. The correct ECOA Code should be reported in the Base, J1 and J2 Segments.

### 14. Question: How is an ECOA change reported?

Answer: Change the ECOA Code to the new value in the segment that has changed. Refer to field descriptions for a list of ECOA codes.

# Frequently Asked Questions and Answers

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## FCRA REQUIREMENTS

### 15. Question: How do I comply with the reporting requirements of the Fair Credit Reporting Act?

Answer:

#### Date of First Delinquency

When an account is delinquent, the FCRA Compliance/Date of First Delinquency (Base Segment Field 25) should reflect the date of the first delinquency (in an unbroken chain) that led to the status being reported. Refer to Exhibit 8 for a detailed explanation and examples.

#### Closed Accounts

**XA** – This Compliance Condition Code should be reported to indicate that the account was closed at the consumer’s request.

#### Disputed Accounts

**XB** – This Compliance Condition Code should be reported to indicate that the account information is disputed by the consumer under the Fair Credit Reporting Act.

**XC** – This Compliance Condition Code should be reported to indicate “Completed investigation of FCRA dispute – consumer disagrees”.

**XH** – This Compliance Condition Code should be reported to indicate that the account was previously in dispute, but is now resolved.

#### Closed and Disputed Accounts

**XD** – This Compliance Condition Code should be reported to indicate that the account was closed at the consumer’s request and account information is disputed by the consumer.

**XE** – This Compliance Condition Code should be reported to indicate that the account was closed at the consumer’s request and dispute investigation completed – consumer disagrees.

**Note:** Compliance Condition Codes are reported in Base Segment Field 20. Refer to Exhibit 14 for a list of valid codes and an example that demonstrates how to report these codes.

#### Medical Debts

Third-party data providers who report medical debt information must report the K1 Segment with the Original Creditor Name and Creditor Classification 02 (Medical/Health Care).

Original creditors who report medical payment information must report Account Type Code 90 (Medical Debt).

# Frequently Asked Questions and Answers

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**16. Question: The Fair Credit Reporting Act requires certain information to be reported with regard to returned checks. What are those requirements?**

Answer: For companies who report returned checks, such as collection agencies, factoring companies or check guarantee companies, there are four reporting guidelines:

- The Date Opened (Base Segment Field 10) should contain the date of the check.
- The Highest Credit or Original Loan Amount (Base Segment Field 12) should contain the original amount of the check, excluding fees and interest.
- The Original Creditor Name (K1 Segment Field 2) should contain the name of the payee. Report Creditor Classification 02 (K1 Segment Field 3) when the name of the payee represents a provider of medical services, products or devices.
- The FCRA Compliance/Date of First Delinquency (Base Segment Field 25) should contain the date the check was returned for nonsufficient funds. If not available, report the date of the check.

## DELETING ACCOUNTS/BORROWERS

**17. Question: How can an account, or a specific borrower, be deleted from the consumer reporting agencies' files?**

Answer: It is imperative that only inaccurate accounts be deleted from the consumer reporting agencies' files. In order to maintain the accuracy and integrity of consumer files, historical consumer credit information must be reported in a factual and objective manner. Paid derogatory accounts, such as collections, should be reported as paid; they should not be deleted.

To delete an entire account, ***for reasons other than fraud***, report Account Status Code **DA** (Field 17A). All borrowers will be deleted along with the account history.

To delete an entire account, ***due to confirmed fraud***, report Account Status Code **DF** (Field 17A). All borrowers will be deleted along with the account history.

To delete a specific borrower, report **Z** in the ECOA Code field of the segment containing the consumer to be deleted.

# Frequently Asked Questions and Answers

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## CONSUMER INFORMATION

### 18. Question: How should a new borrower be added to an existing account?

Answer: Append a J1 or J2 Segment for the new borrower and report Consumer Transaction Type **1** in Field 2.

- A J1 Segment should be used to add a new borrower living at the same address as the consumer reported in the Base Segment.
- A J2 segment should be used to add a new borrower living at a different address from the consumer reported in the Base Segment.

### 19. Question: How should a consumer's association with an existing account be terminated?

Answer: Report **T** in the ECOA Code field (Base Segment Field 37, J1/J2 Segment Field 10) in the segment containing the consumer for whom the association is to be terminated. All payment history for this account will be retained. Do not report this consumer in subsequent reporting periods.

### 20. Question: How should deceased borrowers be reported?

Answer: Deceased borrowers should be reported through use of the ECOA Code **X** in the appropriate Base Segment Field 37 or J1/J2 Segment Field 10.

Reporting a consumer as deceased provides valuable information on the credit report. If another consumer tries to use the identity of a deceased consumer, the "deceased" information will appear on the credit report, helping to deter the fraudulent activity.

### 21. Question: How should a business account be reported when a consumer is personally liable?

Answer:

- Report the consumer's information in the Base Segment with the appropriate ECOA Code (Field 37).
- Report the business name in the J2 Segment with ECOA Code **W** (Business/Commercial) in Field 10.

**Note: The business name will not be added to the consumer credit databases.**

# Frequently Asked Questions and Answers

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## DUPLICATE TRADELINES

**22. Question: What causes duplicate tradelines?**

Answer: Any change in Account Number, Identification Number, Portfolio Type and/or Date Opened may cause duplication if the consumer reporting agencies are not notified prior to the change.

## MEDIA

**23. Question: What types of media are acceptable?**

Answer: Contact each of the consumer reporting agencies to determine what types of media are accepted.

**24. Question: Does a carriage return on a diskette prevent processing?**

Answer: A carriage return/line feed should be used between each record, and a carriage return should be used at the end of the last record. A carriage return should never be used within a record because it will prevent the consumer reporting agencies from processing the data.

# Frequently Asked Questions and Answers

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## FIRST TIME REPORTERS

**25. Question: Are there any special reporting requirements for a first time reporter when sending data to the consumer reporting agencies?**

Answer: It is very important to ensure that the FCRA Compliance/Date of First Delinquency is reported accurately.

When historical credit information is reported in the Payment History Profile (Field 18), the Date of First Delinquency must reflect the date of the first delinquency that led to the earliest delinquency reported in the Payment History Profile. ***In this situation, the Date of First Delinquency must be reported, regardless of the Account Status Code being reported.***

Examples:

Account Status = 93 (Collection)  
Payment History Profile = GGGGGGGGGGGG666654321100  
Date of Account Information = 10/31/2005  
Date of First Delinquency = 12/31/2003

In the above example, 12/31/2003 represents the date of the earliest 30-day delinquency represented in the Payment History Profile that led to the Collection (Code G) being reported.

Account Status = 11 (Current)  
Payment History Profile = 00000GGGGGGGGGGGGGGGGGGGG  
Date of Account Information = 10/31/2005  
Date of First Delinquency = 03/31/2002

In the above example, 03/31/2002 represents the date of the earliest 30-day delinquency that led to the Collection (Code G) reported in the Payment History Profile. In this scenario, the 30-day delinquency was outside the time period represented in the Payment History Profile.

# Frequently Asked Questions and Answers

## REPORTING SCENARIOS

### 26. Question: When and how should Debit Cards be reported?

Answer: Debit Cards should be reported only when backed by a line of credit or overdraft protection.

Report the following Base Segment fields as specified:

- Account Type Code = 43 (Debit Card)
- Portfolio Type = C (Line of Credit), O (Open) or R (Revolving) depending on the terms
- Highest Credit or Original Loan Amount = highest balance ever attained when the overdraft protection was used

### 27. Question: Is there a preferred method of reporting when accounts are completely or partially reaffirmed in bankruptcy?

Answer: For accounts that are completely reaffirmed in bankruptcy, report the appropriate Account Status (Field 17A) and the Consumer Information Indicator **R**, which states "Reaffirmation of Debt". The Consumer Information Indicator (Base Segment Field 38 and J1/J2 Segment Field 11) should be reported for each consumer who was involved in the bankruptcy.

For accounts that are partially reaffirmed in bankruptcy, report a separate tradeline with a new Account Number for the portion of the account that is in repayment. For this new tradeline, report the Consumer Information Indicator **R** for each affected consumer, which states "Reaffirmation of Debt", plus the appropriate Account Status. For that portion of the original tradeline which is still included in bankruptcy, report the appropriate Account Status (Field 17A), the appropriate Consumer Information Indicator (Base Segment Field 38 and J1/J2 Segment Field 11), and adjust the Current Balance (Field 21) accordingly.

### 28. Question: What Account Status Code should be reported with the Bankruptcy Consumer Information Indicators?

Answer: For accounts where all associated borrowers are reported with a Bankruptcy Consumer Information Indicator, report the Account Status Code that represents the status of the account just prior to notification of the bankruptcy.

For joint accounts where only one borrower files bankruptcy, report the Consumer Information Indicator (CII) set to the appropriate bankruptcy code for the borrower who filed bankruptcy. The CII for the other borrower should be blank. Continue to report the Account Status, Current Balance and all applicable fields for the account for the borrower who did **not** file bankruptcy.

**Note:** The critical piece of displayable information for the bankrupt borrower is the Consumer Information Indicator.

# Frequently Asked Questions and Answers

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## 29. **Question: How should a joint account be reported when one borrower filed Bankruptcy Chapter 13 and the other borrower did not?**

Answer: There are two methods that are recommended when reporting joint accounts where one borrower filed Bankruptcy Chapter 13 and the other borrower did not.

1. If both borrowers are held to the same terms based on the Bankruptcy Chapter 13 plan, report one account. If the Terms Duration, Terms Frequency and Scheduled Monthly Payment Amount have changed, report the new values. Continue reporting the account each month with the appropriate Account Status Code.

For the borrower who filed the Bankruptcy, report Consumer Information Indicator **D** (Chapter 13 Petition) or **H** (Chapter 13 Completed). The Consumer Information Indicator for the non-filing borrower should be blank.

2. If the borrowers are given different terms, report two accounts. The Account Numbers must be different for the two borrowers for reporting purposes. Therefore, one of the borrowers must be terminated from the original account number. The Terms Duration, Terms Frequency and Scheduled Monthly Payment Amounts can then be different on the two accounts.

Borrower A – Report the existing account number with adjusted terms and amounts, as necessary. Continue reporting the account each month with the Account Status Code that applies to this borrower.

Borrower B – Under the original account number, report ECOA Code **T** to terminate this borrower from this account number. Report a second account with a different account number with the appropriate terms, amounts and Account Status that applies to this borrower.

For the borrower who filed the Bankruptcy, report Consumer Information Indicator **D** (Chapter 13 Petition) or **H** (Chapter 13 Completed). The Consumer Information Indicator for the non-filing borrower should be blank.

# Frequently Asked Questions and Answers

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**30. Question: How should an account included in bankruptcy be reported if a “Relief from Stay” is granted to the creditor?**

Answer: Report the appropriate Consumer Information Indicator for the borrower who included the account in bankruptcy (filer).

**Note:** Even though the creditor can pursue collection of collateral, the account is still included in bankruptcy. The reporting of the Consumer Information Indicator has no impact on the creditor's ability to collect.

**31. Question: How should bankruptcies be reported when the consumer voluntarily surrenders the merchandise or redeems the merchandise?**

Answer: When a bankruptcy is filed, the consumer can voluntarily surrender the merchandise to the creditor. In this situation, report Account Status Code **95** (Voluntary Surrender) and the appropriate Consumer Information Indicator.

The consumer also has the option to pay fair market value, thereby redeeming the merchandise. In this situation, report Account Status Code **13** (Paid/closed account), Special Comment Code **AU** (Account paid in full for less than the full balance), and the appropriate Consumer Information Indicator.

**32. Question: Is there a preferred method of reporting when an account is partially charged off?**

Answer: Report the original account with the appropriate Account Status for that month (e.g., Current, 30 days delinquent, 60 days delinquent) with a balance that does not include the amount charged to loss.

The charged off portion of the balance should be reported as a separate account with a new Account Number. Other pertinent fields should be reported as follows:

- Date Opened = original date opened
- Original Charge-off Amount = amount charged to loss
- FCRA Compliance/Date of First Delinquency = date of the first delinquency in the series of delinquencies that led up to the charge-off

If the new account is subsequently charged off, both accounts would be reported as Account Status Code **97** (Charge-off), but would have different Original Charge-off Amounts.

# Frequently Asked Questions and Answers

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**33. Question: If a credit card is temporarily unavailable for use because the credit grantor is conducting an investigation, how should the account be reported?**

Answer: Continue to report the account as usual.

When the investigation is complete, if it is discovered that the account was opened or used fraudulently, report Account Status Code **DF** to delete the account.

Otherwise, continue to report the account as usual.

**34. Question: How should an account be reported when an auto lease is paid in full, yet there are over mileage charges, excess wear & tear charges, or other outstanding charges on the account?**

Answer: When there are outstanding charges, continue to report the account with Special Comment Code **BD** (Full Termination, Balance Owing) and Account Status Code **11, 71, 78, 80, 82, 83, 84** or **93**. Do not change the Original Loan Amount, but add the outstanding charges to the Current Balance and Amount Past Due, if appropriate. When all outstanding charges have been paid in full, report Account Status Code **13** or **62**, as applicable.

Even though the lease contract is terminated and all regular payments have been made in full, the account should not be reported as paid (Account Status Code 13) because there are other outstanding charges and the Current Balance is not yet zero. The fact that the lease is terminated is reported through the Special Comment BD.

If the fees are not paid and the outstanding amount is charged off, report Account Status Code **97** (Unpaid balance reported as a loss – charge-off).

**35. Question: How should settled accounts be reported?**

Answer: Report the following Base Segment fields as specified:

- Account Status Code = 13 or 61-65, as applicable
- Payment Rating = required when the Account Status Code is 13 or 65. Blank fill for Account Status Codes 61-64.
- Special Comment = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero

# Frequently Asked Questions and Answers

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## 36. Question: How should a paid in full, closed account be reported?

Answer: Report the following Base Segment fields as specified:

- Account Status Code = 13 or 61-65, as applicable
- Payment Rating = required when the Account Status Code is 13 or 65. Blank fill for Account Status Codes 61-64.
- Current Balance and Amount Past Due = zero
- Date Closed = the date the account was paid in full

## 37. Question: How should a closed account be reported that has an outstanding balance?

Answer: For Revolving, Open and Line of Credit accounts **only**, report the following Base Segment fields as specified:

- Portfolio Type = R (Revolving), O (Open) or C (Line of Credit) depending on the terms
- Account Status Code = 11, 71, 78, 80, 82-84, as applicable
- Compliance Condition Code = if account closed at consumer's request, report the appropriate code XA, XD, XE or XJ, **OR**
- Special Comment Code = M, if account closed by credit grantor
- Current Balance = the outstanding balance amount as of the Date of Account Information
- Amount Past Due = required when the Account Status Code is 71, 78, 80, 82-84
- Date Closed = the date the account was closed

**Note:** Do not report an account as closed by credit grantor **and** closed at consumer's request. Only one closed code can apply.

## 38. Question: How long should paid accounts (Account Status Codes 13, 61-65) continue to be reported?

Answer: Use the following guidelines if paid accounts are re-reported:

- Freeze the Payment History Profile and Date of Account Information as of the date the account was paid.
- Do not re-report paid accounts for more than three months.

# Frequently Asked Questions and Answers

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## **39. Question: How should a refinanced/renewed loan be reported?**

Answer: There are three options for reporting:

1. If the original Account Number and Date Opened are retained, modify the amounts and terms as per the refinanced agreement. Fields that may be changed include Original Loan Amount, Terms Duration, Terms Frequency, Scheduled Monthly Payment Amount and Current Balance. A notation that the loan has been refinanced/renewed is not needed.
2. If the original Account Number changes and the Date Opened remains the same, follow the above reporting guideline, and include an L1 Segment with the new Account Number. Refer to the L1 Segment specifications within the Field Definitions for reporting guidelines.
3. If the Date Opened changes, report the old loan as specified:
  - Account Status Code = 13 (Paid)
  - Payment Rating = the appropriate code that identifies the status of the account within the activity period being reported
  - Special Comment = AS (Account closed due to refinance)
  - Current Balance and Amount Past Due = zero

Report the newly refinanced/renewed loan with the new Date Opened and all other applicable fields. Payment history that occurred prior to the new Date Opened should not be reported with this account.

# Frequently Asked Questions and Answers

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## 40. Question: How should lost or stolen credit cards be reported?

Answer: There are two options for reporting:

1. **Preferred Option:** Report the L1 Segment to change the Account Number. Use of the L1 Segment allows the consumer reporting agencies to retain all prior account history.

If the payment history is invalid due to the credit card being lost or stolen, use the Payment History Profile (Field 18) to correct the history. If accurate payment history is not known during the time frame when the credit card was lost or stolen, report value **D** for months that are unknown in the Payment History Profile. For example:

Date of Account Information = 09/15/2006  
Account History = Always current  
Unknown Months of History = July and August 2006  
Payment History Profile = DD000000000000000000000000

2. Report Special Comment Code **BL** (Credit card lost or stolen) and the appropriate Account Status Code. Do not report this account on subsequent updates.

If the payment history is invalid due to the credit card being lost or stolen, use the Payment History Profile (Field 18) to correct the history. If accurate payment history is not known during the time frame when the credit card was lost or stolen, report value **D** for months that are unknown in the Payment History Profile. For example:

Date of Account Information = 09/15/2006  
Account History = Always current  
Unknown Months of History = July and August 2006  
Payment History Profile = DD000000000000000000000000

If opening another account, report the new credit card as a separate account with a new Account Number, the same Date Opened as the lost/stolen account, and the appropriate Account Status Code and Current Balance.

# Frequently Asked Questions and Answers

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## 41. Question: How should deferred loans be reported?

Answer: Report the following Base Segment fields as specified:

- Terms Duration = blank
- Terms Frequency = D (Deferred)
- Account Status Code = 11 (Current account)
- Highest Credit or Original Loan Amount = the total amount borrowed
- Current Balance = the total amount borrowed minus any payments which have been made
- Scheduled Monthly Payment Amount = zero
- Amount Past Due = zero
- Payment History Profile = Use Character **B** to indicate accounts which have never been in repayment. Use Character **D** to indicate accounts that were previously in repayment but are now deferred.

In the K4 Segment, report the Specialized Payment Indicator **02** for Deferred Payment. Also, report the Deferred Payment Start Date as the date the first payment will be due.

## 42. Question: How should accounts that have been sold to another lender be reported?

Answer: Report the following Base and K2 Segment fields as specified:

- Account Status Code = 05 (Transferred account) **or** the appropriate code that specifies the status of the account prior to the sale
- Payment Rating = if applicable to the Account Status Code being reported
- Special Comment = AH (Purchased by another lender)
- Current Balance and Amount Past Due = zero
- FCRA Compliance/Date of First Delinquency = if the account is delinquent at the time of sale, report the date of the first delinquency
- Date Closed = date the account was sold to the other lender
- K2 Segment Portfolio Indicator = 2 and Sold To Name = name of company to which the account was sold

Additionally, if the account is delinquent or derogatory, it is imperative that you provide the date of the first delinquency that led to the account being sold **to the debt purchaser**.

# Frequently Asked Questions and Answers

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**43. Question: How are “payment reversal” transactions handled when reporting Date of Last Payment, Date of First Delinquency, Payment History Profile and Actual Payment Amount?**

Answer: A “payment reversal” transaction usually occurs when a check is returned for non-payment to the credit grantor. If the change is made in the following month’s reporting cycle, the following adjustments should be made:

- The Date of Last Payment should be adjusted to indicate the date of the last payment made that was not reversed.
- The FCRA Compliance/Date of First Delinquency (DOFD) should reflect the first time the consumer was 30 days past the due date that led to the status being reported. The DOFD would change to the month of the returned check if that had been the first time the consumer was 30 days past the due date.
- The Payment History Profile should reflect the appropriate delinquency in the first position, which reflects the previous month’s payment activity (e.g., **1** if the returned check resulted in the account being 30-59 days past the due date that month).
- The Actual Payment Amount reflects the payment received for this reporting period. If no payment was received for this reporting period, this amount should be zero.

**44. Question: Consumer loans may have multiple payment schedules, which may each have different payment frequencies (e.g., principal amount due annually and interest amount due monthly). How should these loans be reported?**

Answer: Report only one tradeline.

- The Terms Frequency should reflect the most frequent payment schedule. For example, if the principal is due annually and the interest amount is due monthly, report Terms Frequency **M** (Monthly).
- The Scheduled Monthly Payment Amount should reflect the minimum amount due each month and may change when the principal amount is also due.

In months where only the interest payment is due, report Special Comment Code **BT** (Principal deferred/interest payment only). In months where both principal and interest payments are due, the Special Comment Code **BT** should not be reported.

# Frequently Asked Questions and Answers

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## 45. Question: How should credit cards that have both revolving and open terms be reported?

Answer: Report the following Base Segment fields as specified:

- Account Type Code = OG (Flexible Spending Credit Card)
- Portfolio Type = R (Revolving)
- Credit Limit = the valid credit limit for the revolving portion of the account
- Highest Credit or Original Loan Amount = the highest balance ever attained
- Terms Duration = REV
- Scheduled Monthly Payment Amount = the minimum amount due based on the revolving balance, plus the total flexible amount
- Current Balance = the sum of total dollars owed, including revolving and flexible amounts
- Amount Past Due = the portion of the Scheduled Monthly Payment Amount based on the revolving and flexible amounts that is past the due date. (Do not include the current month's amount due in this field.)

Example: A consumer has a credit card on which a \$10,000 credit limit is considered revolving, with a minimum due calculated as a small percentage of the revolving balance. Additionally, the consumer has no preset spending limit and the balance amount over \$10,000 must be paid in full each month. The current balance is \$12,000. The minimum due is 3% of \$10,000 plus the balance over the revolving amount (\$2,000). The Scheduled Monthly Payment Amount is \$2,300.

# Frequently Asked Questions and Answers

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## 46. Question: How should the different stages of foreclosure be reported?

Answer: Use the following guidelines:

Potential Foreclosure – No specific code is available with this designation. Continue reporting the correct Account Status Code that defines the current condition of the account. For example, status 82 represents 120 days delinquent or status 84 represents 180 days delinquent.

Foreclosure Started – Special Comment Code **BO** can be used, which specifically says “Foreclosure proceedings started”. This special comment should be reported each month as long as the comment applies. The appropriate Account Status Code should be reported in conjunction with this special comment, such as status 82 for 120 days delinquent.

Foreclosure Completed – Account Status Code **94** should be reported, which specifies “Foreclosure completed/collateral sold to settle defaulted mortgage”. The appropriate Payment Rating should be reported in conjunction with this Account Status.

Foreclosure Cancelled – No specific code is available for this situation. Therefore, if Special Comment Code BO had been reported, stop reporting the comment (i.e., blank out the Special Comment Code field) and the comment will be deleted from the consumer reporting agencies’ files.

Deed in Lieu – Account Status Code **89** should be reported, which specifies “Deed received in lieu of foreclosure on a defaulted mortgage”. The appropriate Payment Rating should be reported in conjunction with this Account Status.

# Glossary of Terms

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<b>Account Number Scrambling</b>	A security feature that allows a data furnisher to report a scrambled version of the account numbers. Three methods of scrambling are available based on CDIA guidelines. The consumer reporting agencies will unscramble the account numbers for display purposes.
<b>Alphanumeric</b>	Describes a character set that includes both letters and numbers.
<b>ASCII</b>	An acronym for American Standard Code for Information Interchange. A code used by certain types of computers.
<b>Authorized User</b>	Person permitted by a credit card holder to charge goods and services on the cardholder's account. Authorized users are not legally responsible for payment of the charges incurred.
<b>Automatic Stay</b>	The filing of a bankruptcy, under any chapter of the Bankruptcy Code, stops most actions by any creditor against the debtor or the debtor's property. In Chapter 13, the stay even protects co-debtors (non-filers) who are liable with the debtor on consumer debts. The automatic stay gives the debtor protection from his creditors until the rights of all concerned can be balanced in bankruptcy court.
<b>Bankruptcy Discharged</b>	The judgment of the court that a person who has filed a Chapter 7, 11 or 12 petition be granted a bankruptcy.
<b>Bankruptcy Dismissed</b>	A Chapter 7, 11, 12 or 13 petition is denied by the U.S. Bankruptcy Court.
<b>Bankruptcy Petition (Chapter 7)</b>	An application made to the U.S. Bankruptcy Court requesting release from financial obligations due to a debtor's inability to pay his debts.
<b>Bankruptcy Petition (Chapter 11)</b>	An application made to the U.S. Bankruptcy Court requesting financial reorganization.

# Glossary of Terms

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<b>Bankruptcy Petition (Chapter 12)</b>	An application made to the U.S. Bankruptcy Court requesting release from financial obligations due to the inability of a family farm to pay their debts.
<b>Bankruptcy Petition (Chapter 13)</b>	An application made to the U.S. Bankruptcy Court requesting court assistance to pay one's debts.
<b>Bankruptcy Withdrawn</b>	The petitioner has decided not to file bankruptcy and has taken back the petition.
<b>Blocking</b>	Combining two or more records into a block to increase the efficiency of computer input and output operations.
<b>Byte</b>	One alphanumeric character.
<b>Consumer</b>	One who buys goods or services.
<b>Consumer Data Industry Association (CDIA)</b>	CDIA is an international trade association representing the consumer credit, mortgage reporting, employment and tenant screening, and collection service industries. Headquartered in Washington, DC, CDIA provides legislative assistance and a lobbying function to its members, and establishes standards for the consumer credit reporting industry.
<b>Cycle Reporting</b>	A method by which data furnishers can divide their files for reporting purposes, usually in alphabetical order by surname or by billing date. Reporting takes place at the end of each billing cycle, resulting in more accurate and current reporting of account statuses.
<b>Debt Purchaser</b>	A company or individual who purchases accounts with the intent of collecting debts owed.
<b>EBCDIC</b>	An acronym for Extended Binary Coded Decimal Interchange Code. A code used by certain types of computers.

# Glossary of Terms

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<b>ECOA (Equal Credit Opportunity Act)</b>	A federal law that prohibits creditors from discriminating against applicants on the basis of sex or marital status in any aspect of a credit transaction.
<b>ECOA Code</b>	An alpha or numeric code used to describe a borrower's association with an account, according to the Equal Credit Opportunity Act (ECOA).
<b>Factoring Company</b>	See Debt Purchaser.
<b>FCBA (Fair Credit Billing Act)</b>	A federal law stipulating procedures to help consumers resolve credit billing disputes with the credit grantor promptly and fairly. Disputes must be reported.
<b>FCRA (Fair Credit Reporting Act)</b>	The FCRA states that companies which furnish data to the consumer reporting agencies have a responsibility to provide accurate information, to update and correct information and to respond to notices of dispute. It also states that consumers have the right to know what is in credit records; to challenge the accuracy of information; and to have it re-verified, updated or removed. It also limits the time derogatory information can be retained on a credit record and assures that a consumer's privacy will be protected at all times.
<b>FDCPA (Fair Debt Collection Practices Act)</b>	The FDCPA regulates the activities of debt collectors concerning their communications with consumers, prohibiting harassment or abuse, false or misleading representations, and unfair practices.

# Glossary of Terms

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<b>Fixed Length Record</b>	<p>A record that always contains the same number of characters.</p> <p>For example, you may report a 426-byte Base Segment, a 100-byte J1 Segment, and a 30-byte K4 Segment for every record. The fixed record length would be 556. If there is no associated consumer on the account, report the Base Segment, report the J1 Segment Identifier, blank fill the remainder of the J1 Segment, and report the K4 Segment information.</p>
<b>Flexible Spending Credit Card</b>	<p>Credit card that combines the attributes of both revolving and open accounts. Refer to Frequently Asked Question 45 for reporting guidelines.</p>
<b>Installment (Portfolio Type)</b>	<p>A loan repayable in installments, usually in set monthly amounts.</p>
<b>Line of Credit (Portfolio Type)</b>	<p>An agreement between an institution and a consumer where the institution agrees to lend a consumer funds up to an agreed upon credit limit. The consumer may borrow as much of the line as needed and pays interest on the borrowed portion only. Payment amounts are revolving, based on the outstanding balance amount.</p>
<b>Media</b>	<p>Computerized magnetic tape, cartridge, diskette, or electronic data transfer containing consumer credit information.</p>
<b>Mortgage (Portfolio Type)</b>	<p>A written conveyance of title (i.e., contract or deed) to real estate property to secure the payment of a debt. The creditor has actual title to the property, but the property remains with the use and occupancy of the borrower as long as the conditions of the mortgage are met.</p>
<b>Open (Portfolio Type)</b>	<p>Accounts where the entire balance is due upon demand or that have one payment due as scheduled (i.e., Terms Duration = 001). This Portfolio Type is used by credit card reporters when there is no credit limit and the full balance amount is due each month (i.e., no revolving terms). This Portfolio Type is also used by Collection Agencies, Child Support Agencies, Debt Purchasers, Student Loan Guarantors, the U.S. Department of Education (as guarantor) and Utility Services' payment plans.</p>
<b>Personal Receivership</b>	<p>Debt repayment plan administered by a court-appointed trustee.</p>

# Glossary of Terms

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<b>Reaffirmation of Debt</b>	An agreement made prior to discharge in bankruptcy to pay certain debts that otherwise would be discharged through the bankruptcy proceedings. Debts can be partially or completely reaffirmed.
<b>Reaffirmation of Debt Rescinded</b>	The consumer may rescind a reaffirmation agreement prior to the bankruptcy discharge or within 60 days after the reaffirm agreement is filed with the court, whichever occurs later. A consumer files a rescind of debt (requires judge's signature) for one or more of the debts in the reaffirm. This means that the reaffirm is canceled (taken back) and the debts are again included in or discharged through bankruptcy.
<b>Redemptions (due to Bankruptcy)</b>	In a Bankruptcy filing, the consumer can choose to redeem merchandise from a creditor by paying fair market value. Refer to Frequently Asked Question 31 for reporting guidelines.
<b>Relief from Stay</b>	A bankruptcy judge grants a secured creditor the right to collect a debt that has been included in bankruptcy, to the extent that the order permits.
<b>Revolving (Portfolio Type)</b>	An account that establishes a maximum credit limit for a consumer, such as a credit card or charge account. Payment amounts are revolving, based on the outstanding balance amount.
<b>Third Party Collection Agency</b>	A company or individual who specializes in collecting outstanding debts for other businesses or individuals.
<b>Variable Length Record</b>	<p>Records which may be different lengths within predetermined minimums and maximums. Variable length records allow a data furnisher to report only the size of record required for a transaction, thus allowing more data to be placed on the media.</p> <p>For example, the J1 and J2 Segments would be reported only when additional borrowers are associated with an account. Some records may include these appendages, while others may not.</p>

# Implementation Checklist

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## IMPLEMENTATION OF THE METRO 2 FORMAT

The Metro 2 Format Implementation Checklist will guide you step by step through the process of changing to the Metro 2 Format. Following these guidelines will ensure that the credit information you report is accurate, complete and timely.

Prior to reporting in Metro 2 for the first time, you must complete testing with each of the consumer reporting agencies to which you report.

Whether reporting through a purchased software package, a third-party data processor or an internally developed program, the data furnisher is ultimately responsible for compliance issues.

When reporting information through a third-party processor, there are certain steps that need to be taken to ensure that information is reported accurately. The steps are:

- Confirm that the processor is supplying all account information in the Metro 2 Format to all consumer reporting agencies.
- Use the Metro 2 Implementation Checklist to review in detail what the processor will be reporting to ensure that your portfolio information is reported accurately.

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
1	Obtain a copy of the Metro 2 Format.			<i>Electronically:</i> <a href="http://www.cdiaonline.org/metro.cfm">http://www.cdiaonline.org/metro.cfm</a>  <i>Hard copy:</i> <a href="http://www.cdiaonline.org/store_products.cfm">http://www.cdiaonline.org/store_products.cfm</a>
2	Obtain a Program Identifier (for the Header Record) from each consumer reporting agency.			
3	Compare Metro 2 Field Definitions to available data on your system. The following data should be reported according to the specified definitions in order to process your credit information correctly:	<i>Credit Reporting Resource Guide: Metro 2</i>		
	<b>Header Record - Identification of Reporter:</b>			
	Block Descriptor Word (BDW)	Page 4-1		See FAQ 8.
	Record Descriptor Word (RDW)	Page 4-1		See FAQ 9.
	Record Identifier - HEADER	Page 4-1	Hard code	
	Cycle Number	Page 4-2		See FAQ 11.
	Innovis Program Identifier	Page 4-2	Hard code	
	Equifax Program Identifier	Page 4-2	Hard code	
	Experian Program Identifier	Page 4-2	Hard code	
	TransUnion Program Identifier	Page 4-2	Hard code	
	Activity Date	Page 4-2		
	Date Created	Page 4-2		
	Program Date	Page 4-2		

**Note: References to FAQ numbers can be found in the Frequently Asked Questions and Answers section.**

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
	Program Revision Date	Page 4-3		
	Reporter Name	Page 4-3		
	Reporter Address	Page 4-3		
	Reporter Telephone Number	Page 4-3		
	Software Vendor Name	Page 4-3	Hard coded by Vendor	
	Software Version Number	Page 4-3	Hard coded by Vendor	
	<b>Base Segment - Processing Information:</b>			See FAQ 1.
	Block Descriptor Word (BDW)	Page 4-4		See FAQ 8.
	Record Descriptor Word (RDW)	Page 4-4		See FAQ 9.
	Processing Indicator	Page 4-4	Hard code	
	Time Stamp	Page 4-5		
	Correction Indicator	Page 4-6		
	<b>Base Segment - Account Information:</b>			
	Identification Number	Page 4-7		
	Cycle Identifier	Page 4-7		See FAQ 11.
	Consumer Account Number	Page 4-7		
	Portfolio Type	Page 4-7		
	Account Type	Page 4-8		See Exhibits 1 & 2.
	Date Opened	Page 4-8		
	Credit Limit	Page 4-8		
	Highest Credit or Original Loan Amount	Page 4-9		
	Terms Duration	Page 4-9		See Exhibit 3.
	Terms Frequency	Page 4-10		See Exhibit 3.
	Scheduled Monthly Payment Amount	Page 4-10		See Exhibit 3.
	Actual Payment Amount	Page 4-10		

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
	Account Status	Page 4-11		See FAQ 12, 28 & 38 and Exhibit 4.
	Payment Rating	Page 4-11		See FAQ 12.
	Payment History Profile (up to 24 months)	Page 4-12		See FAQ 25 & 38 and Exhibit 5.
	Special Comment	Page 4-13		See FAQ 12 and Exhibits 6 & 7.
	Compliance Condition Code <sup>1</sup>	Page 4-14		See FAQ 15 and Exhibit 14.
	Current Balance	Page 4-15		
	Amount Past Due	Page 4-15		
	Original Charge-off Amount	Page 4-15		
	Date of Account Information	Page 4-16		
	FCRA Compliance/Date of First Delinquency	Page 4-17		See FAQ 25 and Exhibit 8.
	Date Closed	Page 4-18		
	Date of Last Payment	Page 4-18		
	<b>Base Segment - Primary Borrower Information:</b>			See FAQ 21.
	Consumer Transaction Type	Page 4-18		
	Surname	Page 4-19		
	First Name	Page 4-19		
	Middle Name	Page 4-19		
	Generation Code	Page 4-19		
	Social Security Number	Page 4-20		
	Date of Birth	Page 4-20		
	Telephone Number	Page 4-20		
	ECOA Code	Page 4-21		See FAQ 13, 14, 17, 19, 20 & 21.

<sup>1</sup> When converting from Metro to Metro 2, it is necessary to report the applicable Compliance Condition Code on your first Metro 2 submission, even if you had reported this information through a Special Comment on your last Metro submission.

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
	Consumer Information Indicator <sup>1</sup>	Page 4-22		See FAQ 27, 28, 29, 30 & 31 and Exhibit 9.
	Country Code	Page 4-22		See Exhibit 10.
	First Line of Address	Page 4-23		See Exhibit 11.
	Second Line of Address	Page 4-23		
	City	Page 4-23		
	State	Page 4-24		See Exhibit 12.
	Postal/Zip Code	Page 4-24		
	Address Indicator	Page 4-24		
	Residence Code	Page 4-24		
<b>4</b>	Can you report all borrowers associated with the account?			
	For an associated borrower who lives at the same address as the primary borrower, report the J1 Segment. Fields available:			See FAQ 3, 6, 7 & 18.
	Segment Identifier - J1	Page 4-25	Hard code	
	Consumer Transaction Type	Page 4-25		
	Surname	Page 4-25		
	First Name	Page 4-26		
	Middle Name	Page 4-26		
	Generation Code	Page 4-26		
	Social Security Number	Page 4-26		
	Date of Birth	Page 4-26		
	Telephone Number	Page 4-27		
	ECOA Code	Page 4-27		See FAQ 13, 14, 17, 19, 20 & 21.
	Consumer Information Indicator <sup>1</sup>	Page 4-28		See FAQ 27, 28, 29, 30, & 31 and Exhibit 9.

<sup>1</sup> When converting from Metro to Metro 2, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2 submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro submission.

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
	For an associated borrower who lives at a different address than the primary borrower, report the J2 Segment. Fields available:			See FAQ 3, 6, 7, 18 & 21.
	Segment Identifier - J2	Page 4-29	Hard code	
	Consumer Transaction Type	Page 4-29		
	Surname	Page 4-29		
	First Name	Page 4-30		
	Middle Name	Page 4-30		
	Generation Code	Page 4-30		
	Social Security Number	Page 4-30		
	Date of Birth	Page 4-30		
	Telephone Number	Page 4-31		
	ECOA Code	Page 4-31		See FAQ 13, 14, 17, 19, 20 & 21.
	Consumer Information Indicator <sup>1</sup>	Page 4-32		See FAQ 27, 28, 29, 30 & 31 and Exhibit 9.
	Country Code	Page 4-32		See Exhibit 10.
	First Line of Address	Page 4-33		See Exhibit 11.
	Second Line of Address	Page 4-33		
	City	Page 4-33		
	State	Page 4-34		See Exhibit 12.
	Postal/Zip Code	Page 4-34		
	Address Indicator	Page 4-34		
	Residence Code	Page 4-34		

<sup>1</sup> When converting from Metro to Metro 2, it is necessary to report the applicable Consumer Information Indicator on your first Metro 2 submission, even if you had reported this information through an Account Status Code or Special Comment Code on your last Metro submission.

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
<b>5</b>	For Collection Agencies, Debt Collectors, Factoring Companies, Check Guarantee Companies, Student Loan Guaranty Agencies, and US Department of Education, a K1 Segment is needed. Fields available:			The K1 Segment is required for these companies. <b>Do not report the K2 Segment.</b>
	Segment Identifier - K1	Page 4-35	Hard code	
	Original Creditor Name	Page 4-35		
	Creditor Classification	Page 4-36		
<b>6</b>	If you've purchased or sold a portfolio, a K2 Segment can be reported. Fields available:			See FAQ 42.
	Segment Identifier - K2	Page 4-37	Hard code	
	Portfolio Indicator	Page 4-37		
	Purchased Portfolio or Sold To Name	Page 4-37		
<b>7</b>	If you provide mortgage information, a K3 Segment can be reported. Fields available:			
	Segment Identifier - K3	Page 4-38	Hard code	
	Agency Identifier	Page 4-38		
	Account Number (of secondary marketing agency)	Page 4-38		
	Mortgage Identification Number	Page 4-38		
<b>8</b>	Specialized payment information, for balloon or deferred payments, can be reported in the K4 Segment. Fields available:			
	Segment Identifier - K4	Page 4-39	Hard code	
	Specialized Payment Indicator	Page 4-39		
	Deferred Payment Start Date	Page 4-39		See FAQ 41.
	Payment Due Date (Balloon Payment)	Page 4-39		
	Payment Amount (Balloon Payment)	Page 4-39		
<b>9</b>	Account Number and/or Identification Number changes can be reported in the L1 Segment. Fields available:			See FAQ 5.
	Segment Identifier - L1	Page 4-40	Hard code	

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
	Change Indicator	Page 4-40		
	New Consumer Account Number	Page 4-40		
	New Identification Number	Page 4-41		
<b>10</b>	Can employment information for the primary borrower be provided in the N1 Segment? Fields available:			
	Segment Identifier - N1	Page 4-42	Hard code	
	Employer Name	Page 4-42		
	First Line of Employer Address	Page 4-42		
	Second Line of Employer Address	Page 4-42		
	Employer City	Page 4-42		
	Employer State	Page 4-42		
	Employer Postal/Zip Code	Page 4-42		
	Occupation	Page 4-43		
<b>11</b>	Can totals be provided in the Trailer Record? Fields available:			
	Record Descriptor Word (RDW)	Page 4-44		See FAQ 9.
	Record Identifier - TRAILER	Page 4-44	Hard code	
	Total Base Records	Page 4-44		
	Total of Status Code DF (Delete due to fraud)	Page 4-44		
	Total Associated Consumer Segments (J1)	Page 4-44		
	Total Associated Consumer Segments (J2)	Page 4-44		
	Block Count	Page 4-44		
	Total of Status Code DA (Delete – other than fraud)	Page 4-45		
	Total of each Status Code individually	Pages 4-45 & 4-46		
	Total of ECOA Code Z (Delete borrower)	Page 4-47		
	Total Employment Segments	Page 4-47		
	Total Original Creditor Segments	Page 4-47		

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
	Total Purchased Portfolio/Sold To Segments	Page 4-47		
	Total Mortgage Information Segments	Page 4-47		
	Total Specialized Payment Information Segments	Page 4-47		
	Total Change Segments	Page 4-47		
	Total SSNs (All Segments)	Page 4-48		
	Total SSNs (Base Segments)	Page 4-48		
	Total SSNs (J1 Segments)	Page 4-48		
	Total SSNs (J2 Segments)	Page 4-48		
	Total Dates of Birth (All Segments)	Page 4-48		
	Total Dates of Birth (Base Segments)	Page 4-48		
	Total Dates of Birth (J1 Segments)	Page 4-49		
	Total Dates of Birth (J2 Segments)	Page 4-49		
	Total Telephone Numbers (All Segments)	Page 4-49		
<b>12</b>	<b><i>Review the following reporting situations:</i></b>			
	Have comments (e.g., Do Not Mail, Charge Off, Fraud, etc.) been removed from name and address fields?			
	When and how should Debit Cards be reported?			See FAQ 26.
	How do you report accounts that are completely or partially reaffirmed in bankruptcy?			See FAQ 27.
	What Account Status Code should be reported with Bankruptcy Consumer Information Indicators?			See FAQ 28.
	How should a joint account be reported when one borrower filed Bankruptcy Chapter 13 and the other borrower did not?			See FAQ 29.
	How should an account included in bankruptcy be reported if a "Relief from Stay" is granted to the creditor?			See FAQ 30.
	How should Bankruptcies be reported when the consumer voluntarily surrenders or redeems the merchandise?			See FAQ 31.

# Implementation Checklist

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Step	Task Description	Reference	Available? Yes or No	Comments
	How should a partially charged off account be reported?			See FAQ 32.
	If a credit card is temporarily unavailable for use because the credit grantor is conducting an investigation, how should the account be reported?			See FAQ 33.
	How should an account be reported when an auto lease is paid in full, yet there are over mileage charges, excess wear and tear charges, or other outstanding charges on the account?			See FAQ 34.
	How should settled accounts be reported?			See FAQ 35.
	How should paid in full, closed accounts be reported?			See FAQ 36.
	How should a closed account be reported that has an outstanding balance?			See FAQ 37.
	How long should paid accounts (Account Status Codes 13, 61-65) continue to be reported?			See FAQ 38.
	How should a refinanced/renewed loan be reported?			See FAQ 39.
	How should lost or stolen credit cards be reported?			See FAQ 40.
	How should deferred loans be reported?			See FAQ 41.
	How should accounts that have been sold to another lender be reported?			See FAQ 42.
	How are "payment reversal" transactions handled?			See FAQ 43.
	How do you report loans with multiple payment schedules?			See FAQ 44.
	How should credit cards that have both revolving and open terms be reported?			See FAQ 45.
	How should the different stages of foreclosure be reported?			See FAQ 46.

# Implementation Checklist

Step	Task Description	Reference	Available? Yes or No	Comments
	How should accounts be reported to comply with the Fair Credit Reporting Act?			See FAQ 15 & 16.
	How can an account, or specific borrower, be deleted from the file?			See FAQ 17.
	What causes duplicate tradelines?			See FAQ 22.
	If you are a first time reporter of credit data, there are special reporting requirements.			See FAQ 25.
	<b>Project Phases:</b>			
<b>13</b>	Review the Metro 2 Format and any conversion questions with your consumer reporting agency representative.			
<b>14</b>	Determine whether data will be reported in the Character or Packed Format.			Character Format is preferred.
<b>15</b>	Develop internal software, and perform internal conversion tests.			
<b>16</b>	To set-up for electronic transmissions, which is the preferred method of reporting, contact all consumer reporting agencies.			
<b>17</b>	Advise all consumer reporting agencies of the expected date they will receive the test transmission or media.			
<b>18</b>	Send test transmission or properly labeled test media, record layout, and documentation to all consumer reporting agencies.			
<b>19</b>	Make corrections to your credit reporting format and data, as required.			
<b>20</b>	Send transmission or properly labeled production media to all consumer reporting agencies.			

# Child Support Reporting

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## GENERAL REPORTING GUIDELINES

The Child Support Enforcement Program was established in 1975 under Title IV-D of the Social Security Act, to help state and local agencies locate absent parents and to collect child support from parents legally obligated to pay.

Child support obligations are renewable from month to month. Although each monthly payment satisfies that month's obligation, the next month immediately begins a new obligation, to be satisfied by the next payment. The entire support obligation is not considered satisfied until the child reaches the age of majority or emancipation, or the statute of limitations for that state has been reached.

- Report data in the standard Metro 2 Format, including the Header Record.
- Report full file on a monthly basis.
- Report the complete name, social security number, and address of the obligor.
- Report the phone number and birth date, when available.
- An acceptable reason for deleting accounts is when Child Support cases are withdrawn by the courts.
- In the Identification Number field, report the internal code that identifies the child support agency where the information is verified.
- All parties reporting credit information must comply with the Fair Credit Reporting Act and any applicable state laws.
- All parties reporting credit information must respond to consumer inquiries.

**Note: The guidelines contained in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2 Format. Refer to the Metro 2 Format for detailed information on segments and field information.**

## CHILD SUPPORT REPORTING GUIDELINES

1. State agencies ***that are able to age the accounts*** should report the following Account Status Codes (Base Segment, Field 17A):

### **Status 11**

Reported for all open, current accounts, and for cases that have been brought current. Use this status when the child, or youngest child (in the case of multiple children), has ***not*** yet reached the age of majority or emancipation, or the statute of limitations for judgments in that state has not been reached.

### **Status 13<sup>1</sup>**

Reported when the Office of Child Support Enforcement rates this case "satisfied." Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

### **Status 62**

Reported when the Office of Child Support Enforcement rates this case as "satisfied" and the account was previously a collection. Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

### **Statuses 71, 78, 80, 82–84<sup>2</sup>**

Reported to reflect the appropriate stage of delinquency (30 days to 180 or more days past the due date).

### **Status 93<sup>2</sup>**

Reported when the Office of Child Support Enforcement rates this case as in collections.

### **Status DA**

Reported when a Child Support case is withdrawn by the courts. The action taken by the consumer reporting agencies is to delete the account from their files.

### **Status 05<sup>1</sup>**

Reported when the child support case is transferred to another state because of the relocation of the obligor. This usually occurs with a URESA (Uniform Reciprocal Enforcement Support Act) account. The state agency is responsible for notifying another agency when the account is being transferred to their jurisdiction.

Report the Payment History Profile, which provides up to 24 months of payment history, in order for the agency to control and maintain the payment history.

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<sup>1</sup> When the Account Status is 05 or 13, the Payment Rating must also be reported.

<sup>2</sup> When Status 71, 78, 80, 82-84 or 93 is reported, the account should be reported with a Special Comment "CS" each month in order to overlay the date of first delinquency. Special Comment "CS" is reported only until the child or youngest child reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

## CHILD SUPPORT REPORTING GUIDELINES

State agencies ***that are unable to age the accounts*** should report the following Account Status Codes (Base Segment, Field 17A):

### **Status 11**

Reported for all open, current accounts, and for cases that have been brought current. Use this status when the child, or youngest child (in the case of multiple children), has ***not*** yet reached the age of majority or emancipation, or the statute of limitations for judgments in that state has not been reached.

### **Status 13<sup>1</sup>**

Reported when the Office of Child Support Enforcement rates this case "satisfied" and the account was previously reported as current. Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

### **Status 62**

Reported when the Office of Child Support Enforcement rates this case "satisfied" and the account was previously a collection. Use this status when the child, or youngest child (in the case of multiple children), ***has*** reached the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

### **Status 93**

Reported when the Office of Child Support Enforcement rates this case as in collections. If a Status 93 is reported, the account should be reported with a Special Comment "CS" each month in order to overlay the date of first delinquency. Special Comment "CS" is reported only until the child or youngest child reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

### **Status DA**

Reported when a Child Support case is withdrawn by the courts. The action taken by the consumer reporting agencies is to delete the account from their files.

### **Status 05<sup>1</sup>**

Reported when the child support case is transferred to another state because of the relocation of the obligor. This usually occurs with a URESA (Uniform Reciprocal Enforcement Support Act) account. The state agency is responsible for notifying another agency when the account is being transferred to their jurisdiction.

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<sup>1</sup> When the Account Status is 05 or 13, the Payment Rating must also be reported.

## CHILD SUPPORT REPORTING GUIDELINES

2. Portfolio Type (Base Segment, Field 8) — O (Open)
3. Account Type Codes (Base Segment, Field 9)
  - 50 — Family Support
  - 93 — Child Support
4. Date Opened (Base Segment, Field 10) — the date the case was initiated with the state agency
5. Highest Credit or Original Loan Amount (Base Segment, Field 12) — zero
6. Terms Duration (Base Segment, Field 13) — 001
7. Scheduled Monthly Payment Amount (Base Segment, Field 15) — the monthly debt obligation of the obligor
8. Special Comment Codes (Base Segment, Field 19) — Any Special Comment Code can be reported on accounts that do not require Special Comment Code CS.

Refer to Exhibits 6 and 7 in the Metro 2 Format for descriptions of Special Comment Codes.

9. Compliance Condition Codes (Base Segment, Field 20) — Report Compliance Condition Codes in conjunction with Account Status Codes and Payment Ratings when comments are required for legal compliance.

Refer to the Metro 2 Format Field 20 Definition for descriptions of Compliance Condition Codes.

10. Current Balance (Base Segment, Field 21) — the total amount due from outstanding support payments. This amount must equal, at a minimum, one Scheduled Monthly Payment Amount.
11. Amount Past Due (Base Segment, Field 22) — the total amount in arrears
12. FCRA Compliance/Date of First Delinquency (Base Segment, Field 25) — the activity date

The FCRA Compliance/Date of First Delinquency must freeze when the child, or youngest child (in the case of multiple children), reaches the age of majority or emancipation, or the statute of limitations for judgments in that state has been reached.

13. ECOA Code (Base Segment, Field 37) — 1 (individual) on all records
14. Consumer Information Indicator (Base Segment, Field 38) — Report code T (Credit Grantor Cannot Locate Consumer) and code U (Consumer Now Located) when appropriate.

Note: Do not report a bankruptcy Consumer Information Indicator unless the child support obligation is included in the bankruptcy.

# Third Party Collection Agency/ Debt Purchaser/Factoring Company Reporting

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## GENERAL REPORTING GUIDELINES

A Third Party Collection Agency is a company or individual who specializes in collecting outstanding debts for other businesses or individuals. A Debt Purchaser/Factoring Company is a company or individual who purchases accounts with the intent of collecting debts owed.

- Report data in the standard Metro 2 Format, including the Header Record.
- Report at least on a monthly basis.
- Report the complete name, address and social security number of the legally liable consumer(s).
- The first time you report to the consumer reporting agencies, report your entire file. On subsequent updates, report the entire file, or at a minimum, newly opened accounts, paid accounts, and accounts which have had changes since the previous reporting period.
- Report paid in full collection accounts before purging the accounts from your internal collection system.
- **Do not delete paid in full collection accounts.**
- Acceptable reasons for deleting accounts are:
  - Accounts which have been canceled and returned to creditor.
  - Accounts which have been forwarded or sold to another entity.
  - Accounts reported in error.
  - Accounts which have been confirmed as fraudulent.
- All parties reporting credit information must comply with the Fair Credit Reporting Act (FCRA), Fair Debt Collection Practices Act (FDCPA), any applicable state laws and regulatory authorities.
- The Date of First Delinquency is used to comply with FCRA sections 605 and 623 (obsolescence period). See page 10-4 of this document for detailed reporting requirements.

## THIRD PARTY COLLECTION AGENCY/DEBT PURCHASER/FACTORING COMPANY REPORTING GUIDELINES

- The Creditor Classification 02 must be reported in the K1 Segment to identify medical debts to assist in complying with the FCRA sections 605 and 623.
- In the Identification Number field, report the internal code that identifies the third party collection agency/debt purchaser/factoring company where information is verified.
- All parties reporting credit information must respond to consumer inquiries.

**Note: The guidelines in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2 Format. Refer to the Metro 2 Format for detailed information on segments and field information.**

## THIRD PARTY COLLECTION AGENCY/DEBT PURCHASER/FACTORING COMPANY REPORTING GUIDELINES

1. Consumer Account Number (Base Segment, Field 7)
  - Report the individual's complete and unique account number as extracted from your file.
  - If the account number changes, report the L1 Segment. See field definitions in the Metro 2 Format.

*Note:* Notify your consumer reporting agencies the first time this situation occurs.

2. Portfolio Type (Base Segment, Field 8) — O (Open)
3. Account Type Codes (Base Segment, Field 9)
  - 48 — Collection Agency/Attorney
  - 77 — Returned Check
  - 0C — Debt Purchaser (a/k/a Factoring Company)
4. Date Opened (Base Segment, Field 10) — the date the account was placed/assigned to the third party collection agency or purchased by the debt purchaser/factoring company. When reporting returned checks, provide the date the check was written.
5. Highest Credit or Original Loan Amount (Base Segment, Field 12) — original assigned amount as of the date placed, assigned or purchased. When reporting returned checks, report the original amount of the check, excluding fees and interest.
6. Terms Duration (Base Segment, Field 13) — 001
7. Account Status Codes (Base Segment, Field 17A) — report **only** the following:
  - 93 — Account assigned to internal or external collections
  - 62 — Paid in full, was a collection account
  - DF — Delete entire account due to confirmed fraud
  - DA — Delete entire account (for reasons other than fraud)
    - Collection Agencies must delete accounts that have been canceled and returned to the creditor.
    - Debt Purchasers/Factoring Companies must delete accounts that have been forwarded or sold to another entity.
    - This value should also be used for accounts reported in error.

***Do not delete paid in full collection accounts.***

## THIRD PARTY COLLECTION AGENCY/DEBT PURCHASER/FACTORING COMPANY REPORTING GUIDELINES

8. FCRA Compliance/Date of First Delinquency (Base Segment, Field 25) — the date of the first delinquency **with the original creditor** that led to the account being placed for collection or sold.

Example:

### **Original Credit Grantor Reports:**

Status Code	Definition	Date of Account Information	Date of First Delinquency
11	Current	01/31/2004	Zero-fill
71	30 days past the due date	02/28/2004	02/28/2004
78	60 days past the due date	03/31/2004	02/28/2004
80	90 days past the due date	04/30/2004	02/28/2004
82	120 days past the due date	05/31/2004	02/28/2004
83	150 days past the due date	06/30/2004	02/28/2004

Account is assigned to collection agency or sold to debt purchaser/factoring company.

### **Collection Agency/Debt Purchaser/Factoring Company Reports:**

Status Code	Definition	Date of Account Information	Date of First Delinquency
93	Collection	08/31/2004	02/28/2004
93	Collection <i>Consumer agrees to a repayment plan. First payment is received by collection agency/debt purchaser/factoring company or credit grantor's internal collection department.</i>	09/30/2004	02/28/2004
93	Collection <i>Consumer continues to make payments. Balance amount is reported as decreasing.</i>	10/31/2004	02/28/2004
62	Paid collection account <i>Balance amount is reported as zero.</i>	11/30/2004	02/28/2004

**Notes: The FCRA Compliance/Date of First Delinquency does not change due to subsequent repayment agreements.**

**When reporting returned checks, report the date the check was returned for insufficient funds. If not available, report the date of the check.**

## THIRD PARTY COLLECTION AGENCY/DEBT PURCHASER/FACTORING COMPANY REPORTING GUIDELINES

### FCRA Compliance/Date of First Delinquency (continued)

Effective March 31, 2004, the FCRA<sup>1</sup> states that “provided that the consumer does not dispute the information, a person that furnishes information on a delinquent account that is placed for collection, charged for profit and loss, or subjected to any similar action, complies with this paragraph, if –

(i) the person reports the same date of delinquency as that provided by the creditor to which the account was owed at the time at which the commencement of the delinquency occurred, if the creditor previously reported that date of delinquency to a consumer reporting agency;

(ii) the creditor did not previously report the date of delinquency to a consumer reporting agency, and the person establishes and follows reasonable procedures to obtain the date of delinquency from the creditor or another reliable source and reports that date to a consumer reporting agency as the date of delinquency; or

(iii) the creditor did not previously report the date of delinquency to a consumer reporting agency and the date of delinquency cannot be reasonably obtained as provided in clause (ii), the person establishes and follows reasonable procedures to ensure the date reported as the date of delinquency precedes the date on which the account is placed for collection, charged to profit or loss, or subjected to any similar action, and reports such date to the credit reporting agency.”

9. Report Compliance Condition Codes (Base Segment, Field 20) and Special Comments (Base Segment, Field 19) in conjunction with Account Status Codes to further define the accounts.

#### **Examples:**

Compliance Condition Code XB (Account information disputed by consumer under the Fair Credit Reporting Act) could be reported with Account Status Code 93.

Special Comment AU (Account paid in full for less than the full balance) could be reported with Account Status Code 62.

10. Current Balance (Base Segment, Field 21) and Amount Past Due (Base Segment, Field 22) — may include fees and interest, depending on state and federal laws. If payments are made, the Current Balance and Amount Past Due should decrease accordingly.

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<sup>1</sup> Fair Credit Reporting Act Section 623 (a) (5)

## THIRD PARTY COLLECTION AGENCY/DEBT PURCHASER/FACTORING COMPANY REPORTING GUIDELINES

11. ECOA Code (Base Segment, Field 37; J1 and J2 Segment, Field 10) — used to designate an account as joint, individual, etc. in compliance with the Equal Credit Opportunity Act (ECOA).

**Note:** Authorized users (ECOA Code 3) should not be reported because they are not contractually liable.

12. Consumer Information Indicator (Base Segment, Field 38; J1 and J2 Segment, Field 11) — used to specify that a consumer has filed bankruptcy or a consumer cannot be located. Refer to Exhibit 9 in the Metro 2 Format for a list of available indicators.

13. Report the K1 Segment, which contains the name of the original creditor and the creditor's classification. When reporting returned checks, report the name of the payee in the Original Creditor Name field. Report Creditor Classification 02 when reporting medical debts and returned checks from providers of medical services, products or devices.

**Notes:** Refer to the guidelines for the K1 Segment in the Metro 2 Format.

CDIA policy and some state laws stipulate that the original creditor must be identified. The purpose of reporting the original creditor name is to help consumers identify the source of accounts that appear on their credit reports. Without the original creditor names, consumers may not know what the accounts represent.

Federal law stipulates that the name of the payee must be identified when reporting returned checks. It also stipulates that medical debts must be identified.

14. The following Base Segment fields are not applicable:

- Cycle Identifier (Field 6) – blank fill
- Credit Limit (Field 11) – zero fill
- Terms Frequency (Field 14) – blank fill
- Scheduled Monthly Payment Amount (Field 15) – zero fill
- Payment Rating (Field 17B) – blank fill
- Payment History Profile (Field 18) – blank fill
- Original Charge-off Amount (Field 23) – zero fill

# Student Loan Reporting

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## GENERAL REPORTING GUIDELINES

Reporters of student loan information include lenders, servicers, secondary markets, guaranty agencies, collection agencies and the U.S. Department of Education.

The following reporting guidelines refer to all reporters of student loan information:

- Report data in the standard Metro 2 Format, including the Header Record.
- Report on a monthly basis.
- Report all open accounts monthly.
- Report transferred, paid, and government claim accounts at the end of the month in which they occur.
- Report the complete name, address and social security number of the consumer.
- In the Identification Number field, report the internal code that identifies the lender, servicer, secondary market, or guarantor where information is verified.
- All parties reporting credit information must respond to consumer inquiries.

**Note: The guidelines in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2 Format. Refer to the Metro 2 Format for detailed information on segments and field information.**

## LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

1. Account Type Code (Base Segment, Field 9) — 12 (Education) for all accounts
2. Terms Duration (Base Segment, Field 13) — report monthly terms while the loan is in repayment

Terms Duration for loans in “initial school period” and a “grace period” should be blank filled since there are currently no terms. For loans in “forbearance”, report the terms that have been set for interest payments only.

3. Account Status Codes (Base Segment, Field 17A)

- 11 — Open account in good standing

**Note:** Do not report loans until the monies are disbursed to the student.

- 11 with Terms Frequency D and Payment History Profile Character B — Open account/payments deferred/account was never in repayment
- 11 with Terms Frequency D and Payment History Profile Character D — Open account/payments deferred/account was previously in repayment

**Notes:** Terms Frequency Code D should be used with Account Status Code 11 to show that payments are not currently being made (e.g., deferment, grace period, forbearance), but there is a future payment obligation.

Do not include deferred student loans in calculation of delinquency logic. Report an Amount Past Due = 0.

- 71, 78, 80, 82–84 — the appropriate stage of delinquency (30 days to 180 or more days past the due date)
- 13 — Closed/paid/zero balance account

**Notes:** For paid accounts, report the Date Closed. Also, report both the Current Balance and the Amount Past Due as zero.

When reporting Account Status Code 13, the Payment Rating must also be reported.

- 88 — Claim filed with government for insured portion of balance on defaulted loan

**Notes:** Do not report Account Status 88 until the claim is accepted and paid by the guarantor. In the interim months, continue to report the account with the appropriate delinquent Account Status Code.

If Account Status Code 88 is reported but reversed after government review, report Account Status Code DA to delete the account. The following month, report the account with the original Date Opened, the original Consumer Account Number, and the actual status. If valid payment history is available, it can be reported in the Payment History Profile.

Account Status Code 88 should be reported for the situation called “non-matriculate,” in which the student never enrolled. The claim is filed immediately.

When reporting Account Status Code 88, the Payment Rating must also be reported.

## LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

- 05 with Special Comment Code AT — Account closed due to transfer. (Does not include transferred to a servicer, unless that servicer is the new holder of the note.)

**Notes:** The Current Balance and Amount Past Due should be reported as zero.

When reporting Account Status Code 05, the Payment Rating must also be reported.

4. Payment History Profile (Base Segment, Field 18) — Provides up to 24 months of payment history. For deferred loans, report the Grid Character B for loans that have never been in repayment, and report Grid Character D for loans that were previously in repayment.

**Example** of Payment History Profile for a loan reaching government claim status:

Account Status Code 88, Payment Rating = 6

Date of Account Information = 01/31/2006; Date of First Delinquency = 01/31/2005

Payment History Profile = 665432111111000000000000

In the above example, the Payment History Profile represents, from left to right, 12/31/2005 through 01/31/2004. The 0's indicate the account was current from 1/31/2004 through 12/31/2004. The account became 30 days delinquent in 01/31/2005 and progressed to 180 days delinquent through 12/31/2005. A government claim was filed in 01/31/2006, resulting in the Account Status Code 88.

**Note:** It is important that the Payment History Profile be reported in order for the lender to control and maintain the payment history.

5. Compliance Condition Codes (Base Segment, Field 20) and Special Comments (Base Segment, Field 19)

Report in conjunction with Account Status Codes to further define the accounts.

**Examples:**

- Special Comment AT (Account Closed due to Transfer) — with Account Status Code 05—when an account is sold to another lender.
- Special Comment BT (Principle deferred/Interest payment only) — for loans in forbearance
- Compliance Condition Code XB (Account information disputed by consumer under the Fair Credit Reporting Act) could be reported with Account Status Code 88.

6. FCRA Compliance/Date of First Delinquency (Base Segment, Field 25) — report the date as described in the Metro 2 Format.

7. Consumer Information Indicators (Base Segment, Field 38; J1 Segment, Field 11; J2 Segment, Field 11) – used to specify that a consumer's student loan has been included in bankruptcy or a consumer cannot be located. Refer to Exhibit 9 in the Metro 2 Format for a list of available indicators.

**Note:** Do not report a bankruptcy indicator if the student loan is not included in the bankruptcy.

8. Deferred Payment Start Date (K4 Segment, Field 3) — report for deferred loans.
9. L1 Segment — report one time when account numbers change due to an account acquisition or internal account number change.

## LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

### For Multiple Disbursements of the Same Loan:

- Combine multiple disbursements into a single account.
- Retain the original Consumer Account Number.
- Retain the original Date Opened of the first disbursement.
- Increase the Original Loan Amount, Current Balance, and Scheduled Monthly Payment Amount (when in repayment) to include totals for all disbursements.

**Example:** If the loan is for \$10,000 and the first disbursement is for \$2,000, report the Original Loan Amount field as \$2,000. As additional disbursements are made, increase the Original Loan Amount field to include additional disbursements.

- Change Terms Duration if appropriate.

### For Multiple Loans:

- Multiple loans must be reported as separate accounts.
- When multiple loans are consolidated, report the new loan as Account Status Code 11 and each multiple loan as Account Status 13, with the appropriate Payment Rating.

### For Loans Transferred in from Another Lender:

- If the previous reporter's Consumer Account Number is available, report the L1 Segment to change the Consumer Account Number. The Base Segment should contain the previous reporter's Consumer Account Number, and the L1 Segment should contain the reporter's New Consumer Account Number. The L1 Segment should only be reported the first time the new account number is reported.
- Retain the previous lender's Date Opened.
- Report the K2 Segment (Portfolio Purchased From) at least one time, to show the name of that lender and avoid confusion for the consumer.

**Example:** If XYZ Bank buys accounts from ABC Bank, XYZ Bank or their servicer should report a K2 Segment containing ABC Bank.

**Note:** Notify your consumer reporting agencies the first time this situation occurs, for testing purposes.

## LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

### **For Loans Reported by a Servicer:**

- The Identification Number should refer to the current holder of the note.

**Note:** Verification of accounts will be done with the servicer.

### **For Loans that are Reported when a School Closes:**

- If the loan is forgiven, report Account Status Code DA to delete the account.
- If the loan is not forgiven and payments are due, continue to report the appropriate Account Status Code, along with the Current Balance and other applicable fields.

### **For Loans that are Forgiven when a Student becomes Disabled:**

- If the loan had been in repayment prior to the student becoming disabled, report Account Status Code 13, Payment Rating 0, Current Balance 0, and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.
- If the loan had never been in repayment, report Account Status Code DA to delete the account.

### **For Loans that are Forgiven due to "Teacher Forgiveness":**

- If the loan had been in repayment prior to being forgiven, report Account Status Code 13, Payment Rating 0, Current Balance 0 and Amount Past Due 0 to indicate a paid/closed account, along with the appropriate Date Closed.
- If the loan had never been in repayment, report Account Status Code DA to delete the account.

### **For Loans that were Falsely Certified:**

- Report Account Status Code DF to delete the account.

## GUARANTY AGENCY/U.S. DEPARTMENT OF EDUCATION REPORTING GUIDELINES

- Do not report the account during the review period.
- Do not report the account if it is returned to the lender.
- Guaranty agencies should follow the reporting guidelines for Lender/Servicer/Secondary Market when reporting loans that are not guaranteed by the government.

### GENERAL REPORTING GUIDELINES

1. Consumer Account Number (Base Segment, Field 7) — report the new number as assigned by the guaranty agency.
2. Portfolio Type (Base Segment, Field 8) — O (Open)
3. Date Opened (Base Segment, Field 10) — report the date the defaulted claim was paid to the lender.
4. Highest Credit/Original Loan Amount (Base Segment, Field 12) — report the claim amount that was paid to the lender.
5. Terms Duration (Base Segment, Field 13) — 001 (one payment as scheduled)
6. Terms Frequency (Base Segment, Field 14) — Blank
7. FCRA Compliance/Date of First Delinquency (Base Segment, Field 25) — report the date of the first delinquency **with the original lender** that led to the defaulted claim. If multiple defaults are reported as one loan (compressed), the Date of First Delinquency must be the date of the first delinquency that led to the earliest default.

Effective March 31, 2004, the FCRA<sup>1</sup> states that “provided that the consumer does not dispute the information, a person that furnishes information on a delinquent account that is placed for collection, charged for profit and loss, or subjected to any similar action, complies with this paragraph, if –

(i) the person reports the same date of delinquency as that provided by the creditor to which the account was owed at the time at which the commencement of the delinquency occurred, if the creditor previously reported that date of delinquency to a consumer reporting agency;

(ii) the creditor did not previously report the date of delinquency to a consumer reporting agency, and the person establishes and follows reasonable procedures to obtain the date of delinquency from the creditor or another reliable source and reports that date to a consumer reporting agency as the date of delinquency; or

(continued)

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<sup>1</sup> Fair Credit Reporting Act Section 623 (a) (5)

## GUARANTY AGENCY/U.S. DEPARTMENT OF EDUCATION REPORTING GUIDELINES

(iii) the creditor did not previously report the date of delinquency to a consumer reporting agency and the date of delinquency cannot be reasonably obtained as provided in clause (ii), the person establishes and follows reasonable procedures to ensure the date reported as the date of delinquency precedes the date on which the account is placed for collection, charged to profit or loss, or subjected to any similar action, and reports such date to the credit reporting agency.”

8. Consumer Information Indicator (Base Segment, Field 38; J1 Segment, Field 11, J2 Segment, Field 11) — used to specify that a consumer’s student loan has been included in bankruptcy or a consumer cannot be located. Refer to Exhibit 9 in the Metro 2 Format for a list of available indicators.

**Note:** Do not report a bankruptcy indicator if the student loan is not included in the bankruptcy.

9. K1 Segment — report the complete name of the lender to whom the claim was paid in the Original Creditor Name field. Also, report Creditor Classification Code 07 to indicate Educational.

**Note:** The K1 Segment is required for all accounts reported, regardless of Account Status Code.

# GUARANTY AGENCY/U.S. DEPARTMENT OF EDUCATION REPORTING GUIDELINES

## **For Defaulted Loans:**

Account Status Codes (Base Segment, Field 17A) — report *only* the following:

- 93 — Account assigned to internal or external collections. (Status 93 should be reported immediately after the review period if retained.)

**Notes:** If a consumer is making payments, continue to report the account as a Status Code 93, but report the declining balance.

If accounts are turned over to a Collection Agency and the Collection Agency reports the accounts to the credit bureaus, the guaranty agency should report the accounts as Status DA to delete them. These accounts cannot be reported by both agencies, causing duplication. The FCRA Compliance/Date of First Delinquency should contain the date of the first delinquency with the original lender that led to the default. The K1 Segment should contain the complete name of the original lender/servicer/secondary market to whom the claim was paid, as well as Creditor Classification Code 07.

- 62 — Account paid in full/was a collection account.

## **For Rehabilitated Loans:**

Report Account Status Code DA to delete the account.

**Note:** The claim reported by the original lender will remain on the file until purged according to FCRA guidelines.

## **For Accounts Sent to DOE (Guaranty Agencies Only):**

Report Account Status Code DA to delete the account.

## **For Accounts with a Balance under Total and Permanent Disability:**

Report Account Status Code 62 to indicate the account is paid.

## **For Accounts with a Balance and Consumer who is Responsible for the Account is Deceased:**

Report Account Status Code 62 and ECOA Code X.

## **For Guaranty Agencies Dissolving or Undergoing Bankruptcy:**

Contact the Consumer Data Industry Association (CDIA) to determine the appropriate steps in the reporting process that would be unique to the agency's specific situation.

## **For Loans that are Forgiven when a School Closes:**

Report Account Status Code DA to delete the account.

## STUDENT LOAN GLOSSARY OF TERMS

### **False Certification**

Relief for borrowers for whom the school falsified the borrower's name on either the loan application or disbursement authorization, unless the student received the proceeds of the loan.

### **Forbearance**

An option offered to borrowers who are unable to make regular monthly payments. During the forbearance period, the borrower is responsible only for making interest payments on the loan, which in many cases is capitalized (added to the principal balance).

### **Forgiven Loans**

Government-guaranteed education loans that do not have to be repaid if the school closes due to financial reasons or is shut down by regulators. Students qualify when the loan was disbursed on or after 1/1/1986, the school closed before the student received a degree or certificate, the student could not have completed the education program by transferring credits to another institution, the student was in attendance at the school when it closed or was on an approved leave of absence or had withdrawn from the program no more than 90 days before the school closed. In order for a student loan to be forgiven or discharged, the student must have approval from the U.S. Department of Education.

### **Grace Period**

The period of time, generally six months, between the time the borrower is no longer attending school and the date repayment of the student loan is expected to begin.

### **Guaranty Agency**

A state or private nonprofit organization that has an agreement with the Secretary of the U.S. Department of Education, under which the organization will administer a student loan guarantee program under the Higher Education Act of 1965, as amended. A guarantor pays a claim to the original lender when a student defaults on an educational loan.

### **Initial School Period**

The period of time immediately following the loan disbursement when the borrower is attending school and repayment is not required.

### **Lender**

A bank, credit union, savings and loan association, insurance company, or other lending institution, which is subject to examination and supervision by an agency of the United States.

### **Rehabilitated Loans**

Educational loans that were previously in collections with a guarantor of the U.S. Department of Education. The rehabilitation process requires that a student must commit to, and make, 12 consecutive payments on the loan, in good standing. At that time, the loan can then be resold to a new lender or the original lender.

### **Secondary Market**

An entity which purchases student loan obligations from participating lenders in a secondary market and pays lenders par, premium or discount on the original principal balance of the note. A secondary market may also service the loans that it purchases.

## STUDENT LOAN GLOSSARY OF TERMS

### **Servicer**

An organization that services (i.e., processes) a student loan debt following origination, to ensure due diligence of the debt with respect to enforcement of the terms of the promissory note as defined under Federal regulations.

### **Teacher Forgiveness**

A portion of the Federal Family Education Loan (FFEL) program whereby the Secretary of the U.S. Department of Education repays portions of student loans. To qualify, the student must meet certain criteria, such as teaching, nursing, or volunteering through the Peace Corps.

# Utility Company Reporting

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## GENERAL REPORTING GUIDELINES

Reporters of utility company data include Energy companies (e.g., coal and wood dealers, electric light and power, fuel oil distributors, gas companies — natural and bottled, etc.), Communications companies (e.g., telephone, cable, etc.) and Service companies (e.g., water, garbage, rubbish and other disposal companies, etc.).

The following reporting guidelines apply to all reporters of utility company data:

- Report data in the standard Metro 2 Format, including the Header Record.
- Report all current and delinquent open accounts on a monthly basis.
- Report closed accounts at the end of the month in which they occur.
- Report the complete name, address, and social security number of the legally liable consumer(s).
- Report the phone number and date of birth, when available.
- Report the ECOA Code to designate the account as joint, individual, etc. in compliance with the Equal Credit Opportunity Act (ECOA).
- Report the Payment History Profile, which provides up to 24 months of payment history, in order to control and maintain the payment history.
- In the Identification Number field, report the internal code that identifies the utility company where information is verified.
- All parties reporting credit information must respond to consumer inquiries.
- All parties reporting credit information must comply with the Fair Credit Reporting Act and any applicable state laws.

**Note: The guidelines in this document are specific to your industry and should be used in conjunction with the specifications in the Metro 2 Format. Refer to the Metro 2 Format for detailed information on segments and field information.**

## UTILITY COMPANY REPORTING GUIDELINES

1. Consumer Account Number (Base Segment, Field 7)
  - Report the individual's complete and unique account number as extracted from your file.
  - If a consumer has multiple accounts, the account numbers must be unique. If necessary, append a unique identifier to the original account number for each account.
  - If the account number changes, report the L1 Segment. See field definitions in the Metro 2 Format.

**Note:** Notify your local consumer reporting agencies the first time this situation occurs.
2. Portfolio Type (Base Segment, Field 8)
  - O (Open) - for all utility services' payment plans
  - I (Installment) - for merchandise (e.g., appliances, etc.)
3. Account Type Codes (Base Segment, Field 9)
  - 92 (Utility Company) - for all utility services' payment plans
  - 06 (Installment Sales Contract) - for merchandise (e.g., appliances, etc.)
  - 4D (Telecommunications/Cellular) - for telecommunications companies, as appropriate
4. Highest Credit or Original Loan Amount (Base Segment, Field 12)
  - For utility services' accounts, report the highest balance ever attained.
  - For Installment accounts, report the amount of the contract.
5. Terms Duration (Base Segment, Field 13)
  - For utility services' accounts, report Terms Duration as 001.
  - For Installment accounts, report the number of months of the contract.
6. Terms Frequency (Base Segment, Field 14)
  - For utility services' accounts, blank fill.
  - For Installment accounts, report the frequency for payments due.

## UTILITY COMPANY REPORTING GUIDELINES

7. Scheduled Monthly Payment Amount (Base Segment, Field 15)
  - For utility services' accounts, zero fill.
  - For Installment accounts, report the regularly scheduled monthly payment amount.
8. Account Status Codes (Base Segment, Field 17A) and Payment Ratings (Base Segment, Field 17B)
  - Report full file information, including open/current accounts (Status Code 11), all stages of delinquency (Status Codes 71, 78, 80, 82–84), derogatory accounts (Status Codes 93, 95–97) and closed or paid accounts (Status Codes 13, 61–64). When the Account Status Code is 13 or 95, the Payment Rating must also be reported.
  - Refer to Exhibit 4 in the Metro 2 Format for specific definitions of Account Status Codes.
9. Special Comments (Base Segment, Field 19) and Compliance Condition Codes (Base Segment, Field 20)
  - Report Special Comments and Compliance Condition Codes in conjunction with Account Status Codes to further define the accounts. Refer to Exhibits 6 and 7 in the Metro 2 Format for specific definitions of Special Comments, and the Field 20 Definition for specific definitions of Compliance Condition Codes.  
  
**Example:** Compliance Condition Code XB (Account information disputed by consumer under the Fair Credit Reporting Act) could be reported with Account Status Code 93.
  - When a utility service is terminated due to nonpayment, Special Comment M (Account Closed at Credit Grantor's Request) should be reported with the appropriate Status Code.

If the account is subsequently reinstated, remove the Special Comment M.

10. Current Balance (Base Segment, Field 21)

For all accounts, report the total current balance of the account.

11. Amount Past Due (Base Segment, Field 22)

For delinquent or derogatory accounts, report the dollar amount past due.

# e-OSCAR

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## THE CORRECTION PROCESS

From time to time, you will find it necessary to correct information you have reported to the consumer reporting agencies. The need to modify existing account information may come about as a result of consumer contact or through internal processes.

The Automated Universal Data Process (AUD) is used to make corrections that are not supported by your regular automated reporting process. AUD transactions are submitted through e-OSCAR web<sup>®</sup> the **Online Solution for Complete and Accurate Reporting**.

**Reporting errors must be corrected promptly in order to comply with the Fair Credit Reporting Act [section 623 (a) (2) (B)].**

## AUTOMATED UNIVERSAL DATA PROCESS VIA E-OSCAR

- The intent of the e-OSCAR-web<sup>®</sup> AUD process is to provide the consumer reporting agencies with a correction to a consumer's file that must be handled outside of the regular automated reporting process. e-OSCAR may not be used to add or create a record on a consumer's file.
- When a consumer contacts a data furnisher and requests a change of information that has been previously reported, the data furnisher researches the account. If the data furnisher verifies that the information in question needs to be changed, the company will use the e-OSCAR system to complete an AUD.
- The AUD process allows data furnishers to modify existing account information, or to delete the entire account from a consumer's credit report. A data furnisher may update a consumer's credit information by submitting an Automated Universal Data (AUD) record. The data furnisher uses the system's web-based interactive interface to create the AUD record. The record is routed to one or more consumer reporting agencies, based on the affiliations indicated by the data furnisher during the e-OSCAR registration process and based on the subscriber codes specified in the AUD record.

# e-OSCAR Correction Process

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- Access to e-OSCAR is through a secure website, <https://www.e-OSCAR-web.net>. Each data furnisher has a unique registration and all users have their own userid and password. For more information on e-OSCAR, visit <http://www.e-OSCAR.org>.
- The consumer reporting agencies retrieve their AUDs from e-OSCAR and update the consumers' files accordingly.
- **To complete the process, when a change has been made, data furnishers must also update their internal records to avoid re-reporting incorrect information.**

## FEATURES OF AUD

- **Automatic Carbon Copies** – If you modify or delete an account using the AUD process, e-OSCAR sends the update to the consumer reporting agencies that you designate when you submit the AUD. You have the choice because you may not need to update an account on each of the consumer reporting agencies' databases. Each data furnisher indicates an affiliation with one or more of the consumer reporting agencies at the time of registration. This affiliation can be updated at any time. A notification to all consumer reporting agencies to which you report is required by the Fair Credit Reporting Act. [See section 623 (a) (2) (B).]
- **No Illogical Conditions** – Information within an update must be complete and logical. The e-OSCAR system has built-in edits to prevent illogical conditions.
- **Time Service** – Information on the consumer's file is corrected more quickly – no mail time.

# e-OSCAR

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## CONSUMER DISPUTE PROCESS

The Fair Credit Reporting Act guarantees consumers the right to dispute information that has been previously reported to consumer reporting agencies. (See sections 611 and 623).

The consumer may initiate his or her dispute directly with a consumer reporting agency, one of the affiliates of that repository, or a reseller of consumer reports. ***Regardless of the source at which the dispute originates, the data furnisher must respond.*** (See Federal Trade Commission interpretation letter of July 1999 <http://www.ftc.gov/os/1999/9908/faresletterfinal.htm>).

The law also describes these duties of data furnishers specific to the consumer dispute process:

- Conduct an investigation with respect to the disputed information.
- Review all relevant information provided by the consumer reporting agency.
- Report the results of the investigation to the consumer reporting agency.
- If the investigation finds that the information is incomplete or inaccurate, report those results to all other consumer reporting agencies to which the data provider furnished the information.

The law also mandates a deadline for the completion of the investigation, review, and reporting of the investigation results. This process shall be completed within a 30-calendar day period that ***begins when the consumer contacts the consumer reporting agency.*** (See sections 623 (b) (2) and 611 (a) (1).)

# e-OSCAR Consumer Dispute Process

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## AUTOMATED CONSUMER DISPUTE VERIFICATION (ACDV)

In compliance with FCRA section 611 (a) (5) (D), the consumer credit reporting industry maintains an automated dispute resolution system. This system, called e-OSCAR-web<sup>®</sup>, is available for use by all data furnishers.

## ACDV WORKFLOW

- Each consumer reporting agency and data furnisher has its own access to e-OSCAR-web<sup>®</sup>.
- When a consumer contacts a consumer reporting agency with a dispute, the agency transmits the disputed information into e-OSCAR. The data furnisher accesses e-OSCAR and retrieves the disputed data.
- The data furnisher researches the disputed account and transmits a response back to the originating consumer reporting agency. If the information is verified as correctly reported, the response goes only to the originating consumer reporting agency. If the information is modified or deleted, e-OSCAR automatically sends a response to the originating consumer reporting agency and sends copies to any other consumer reporting agencies with which the data furnisher has registered in e-OSCAR.
- The consumer reporting agencies retrieve responses, update the credit files accordingly and respond back to the consumers.
- The originating consumer reporting agency also notifies the data furnisher of any modifications or deletions as a result of the dispute reinvestigation.
- **To complete the process, when a change has been made, data furnishers must also update their internal records to avoid re-reporting incorrect information.**

# e-OSCAR Consumer Dispute Process

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## FEATURES OF ACDV

- **Automatic Carbon Copies** – If you modified or deleted an account in response to a consumer reporting agency-generated consumer dispute, e-OSCAR will send copies of the dispute and response to each of the consumer reporting agencies with which you have registered an affiliation in e-OSCAR. These copies help to pre-empt future disputes, thus reducing your costs. Consumer credit data will be accurate at all the agencies with which you are registered, which will help to improve customer satisfaction.
- **Automatic Notification** – The Fair Credit Reporting Act requires the originating consumer reporting agency to notify the data furnisher of any modifications or deletions as a result of the dispute reinvestigation. e-OSCAR provides the capability to meet this requirement. [See section 623 (b) (1) (D).]
- **No Illogical Conditions** — When a consumer reporting agency sends out an “I’ve never been late” dispute, they need your assistance in verifying the consumer’s account information. The e-OSCAR system has built-in edits to prevent illogical responses.
- Other benefits include easy tracking of consumer disputes in progress or completed and easy access to a broad range of user reports.