

Weblining and Other Racial Justice Concerns in the Era of Big Data



RACIAL JUSTICE &
EQUAL ECONOMIC
OPPORTUNITY PROJECT
NATIONAL CONSUMER LAW CENTER

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National Consumer Law Center

June 3, 2014



This webinar is part of a series on "Rebuilding Wealth and Economic Opportunity in Communities of Color" sponsored by NCLC's initiative on Racial Justice & Equal Economic Opportunity.

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Racial Justice and Equal Economic Opportunity



The project on Racial Justice and Equal Economic Opportunity seeks to address the abusive and exploitative practices in the marketplace that have decimated the finances of communities of color.

<http://www.nclc.org/issues/racial-justice.html>

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Presenter – Persis Yu



- Is an NCLC staff attorney and works on fair credit reporting, student loans, and on other consumer advocacy issues.
- She is the primary author of NCLC's reports on Big Data and errors in criminal background checks. She is a contributing author to the legal manuals: Fair Credit Reporting Act, Consumer Credit Regulation and to Student Loan Law.
- Prior to joining NCLC, Persis was a Hanna S. Cohn Equal Justice Fellow at Empire Justice Center in Rochester, New York.



Presenter – David Robinson

- Is cofounder of Robinson + Yu, a firm that provides internet expertise for policymakers and advocates.
- He served as the founding Associate Director of Princeton University's Center for Information Technology Policy, a joint venture combining computer science and public policy. In that role, he launched the Center's operations and developed its interdisciplinary research programs.
- He has written and reported for TIME and for the Wall Street Journal, with datelines on three continents.
- He holds bachelor's degrees in philosophy from Princeton and Oxford, where he was a Rhodes Scholar, and a JD from Yale Law School, where he focused on Internet-related law and policy.



robinson
—+yu—



Presenter – Harlan Yu



- Is cofounder of Robinson + Yu, a firm that provides internet expertise for policymakers and advocates. He holds a Ph.D. in computer science from Princeton University, where his research centered on designing software to make the U.S. Congress and the federal courts more transparent and understandable to citizens.
- He has extensive hands-on experience at the intersection of technology and policy, with a focus on information security, privacy and open government.
- He has worked at Google in both engineering and public policy roles, at the Electronic Frontier Foundation as a technologist, and at the U.S. Department of Labor, where he helped develop and implement the Department's open government plan.
- In addition to his Ph.D., he holds a B.S. in electrical engineering and computer sciences from UC Berkeley.



Presenter – Edmund Mierzwinski



U.S. PIRG

- U.S. PIRG Consumer Program Director and Senior Fellow
- Ed has worked in the Washington, DC-based federal lobbying office of the Federation of State Public Interest Research Groups (U.S. PIRG) since 1989.
- He often lectures or testifies before Congress, state legislatures and agencies on a wide range of consumer issues. He has had recent articles in the American Prospect, the Journal of Consumer Affairs and the Suffolk University Law Review.
- In August 2012, he was re-elected to a second 3-year term on the board of directors of Consumer Reports (formerly Consumers Union), the world's largest consumer product testing and advocacy organization.
- He chairs the Americans for Financial Reform (AFR) Consumer Financial Protection Bureau Task Force. He is a founding and current member of the Steering Committee of the Transatlantic Consumer Dialogue (tacd.org). He is on the board of directors of Flyersrights.org. He is a former member of the Federal Reserve Board's Consumer Advisory Council.



WEBLINING AND OTHER RACIAL JUSTICE CONCERNS IN THE ERA OF BIG DATA

NCLC WEBINAR
JUNE 3, 2014

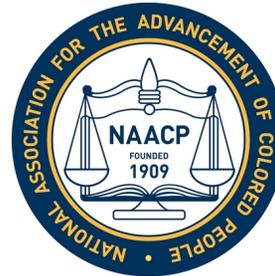
BY David Robinson
david@robinsonyu.com

AND

Harlan Yu
harlan@robinsonyu.com



Civil Rights Principles for the Era of Big Data



[HTTP://WWW.CIVILRIGHTS.ORG/BIGDATA](http://www.civilrights.org/bigdata)

Civil Rights Principles for the Era of Big Data

1. Stop High-Tech Profiling.

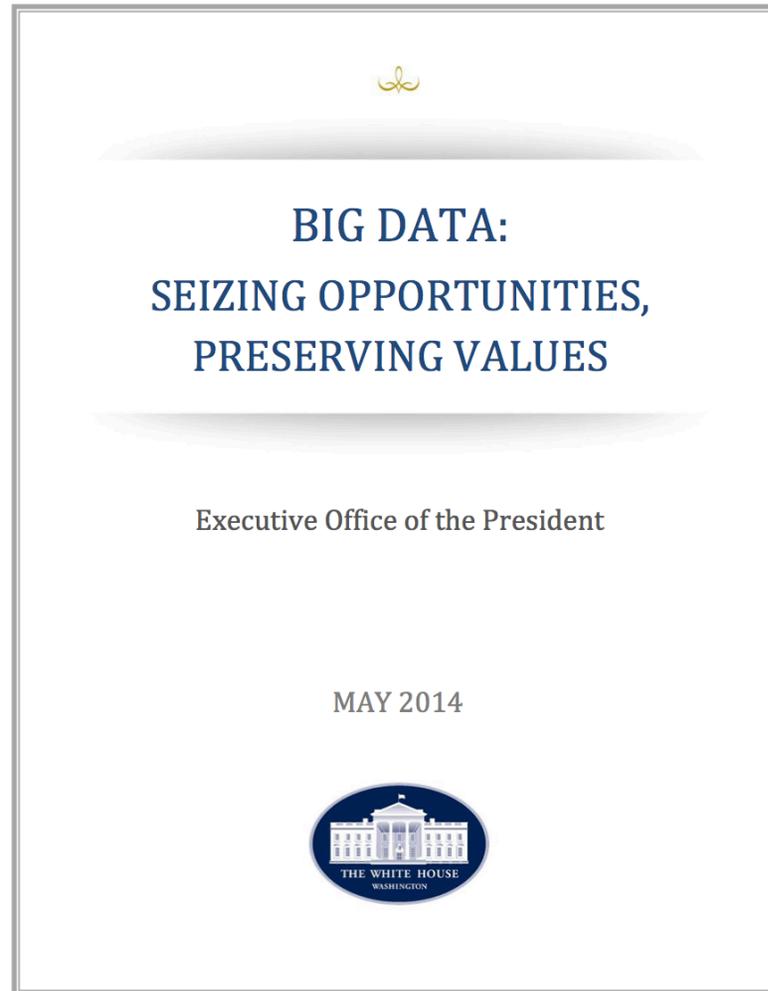
2. Ensure Fairness in Automated Decisions.

3. Preserve Constitutional Principles.

4. Enhance Individual Control of Personal Information.

5. Protect People from Inaccurate Data.

White House Big Data Report



[HTTP://WWW.WHITEHOUSE.GOV/BIGDATA](http://www.whitehouse.gov/bigdata)

UNDERWRITING

INDIVIDUAL
CREDIT SCORES



CREDIT
FILES

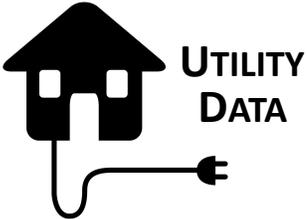


UNDERWRITING

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MAINSTREAM
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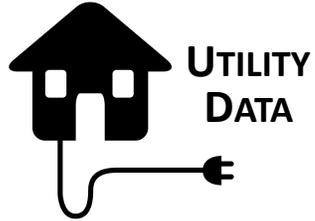


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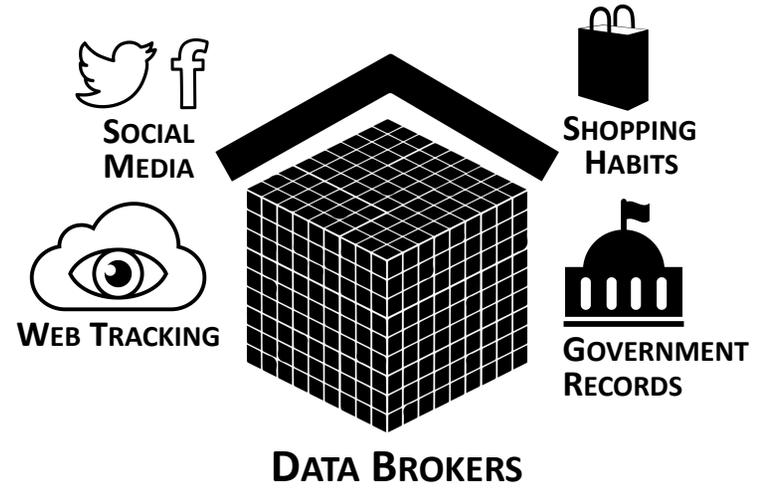
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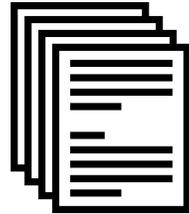
MARKETING



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UTILITY
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MARKETING



SOCIAL
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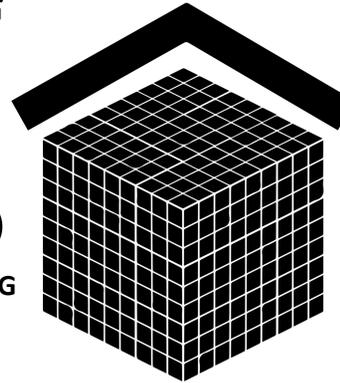
SHOPPING
HABITS



WEB TRACKING



GOVERNMENT
RECORDS



DATA BROKERS



BARELY
AGGREGATED
CREDIT DATA



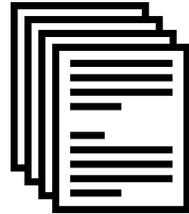
MARKETING SCORES



CREDIT-DRIVEN
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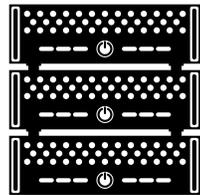
CREDIT
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MAINSTREAM
ALTERNATIVE
CREDIT SCORES



UTILITY
DATA

FRINGE
ALTERNATIVE
CREDIT SCORES



"ALL DATA IS
CREDIT DATA"

MARKETING



SOCIAL
MEDIA



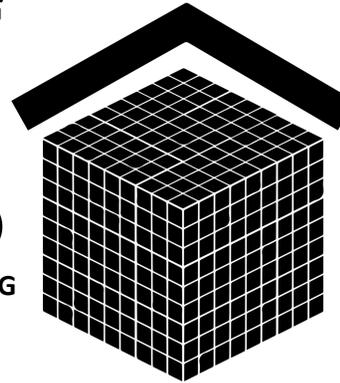
SHOPPING
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BARELY
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CREDIT DATA

MARKETING SCORES

CREDIT-DRIVEN
MARKETING SCORES

QUESTIONS?

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Weblining and Other Racial Justice Concerns in the Era of Big Data

NCLC Webinar, 3 June 2014

Ed Mierzwinski (edm@pirg.org)

U.S. PIRG & U.S. PIRG Education Fund



NCLC Big Data and Racial Justice Webinar
on 3 June 2014, Ed Mierzwinski, U.S. PIRG

Weblining and Other Racial Justice Concerns in the Era of Big Data

Summary:

- New financial products & web practices already affect vulnerable consumers [online payday loans, e-scores, massively enhanced online lead generation & tracking systems]
- New period of accelerated change: prepaid cards; mobile wallets; location payments
- Emerging practices largely unregulated
- Harms potentially include FCRA, ECOA violations, dynamic pricing (different price, same product; as well as limited choices of products (weblining))
- **Education, coalition-building and advocacy required**

I. Lead Generation – Leading The Way In An Intrusive, Secretive Online Consumer Tracking & Profiling Ecosystem



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Online, financial consumers are targeted and consumers are auctioned off

- Online practices may not always be regulated by FCRA
- Scoring is highly developed by financial firms
- Web calculators are actually data collectors
- Loan searches put you on misleading lead-generator sites that auction you to highest bidder
- On and offline data combined to create predictive financial e-scores



Lead Generation



- Leads are potential customers for products or services, and so-called online “hot leads”—people deemed to be ready to buy or to sell to—are a valuable commodity.
- One payday lead generator, for example (which to the average consumer appears to be offering the loans itself), sells leads to the actual payday lenders for \$9 each. Others charge much more.
- Companies use a variety of advertising and search-engine optimization techniques to lure consumers to provide their information so they can be sold as prospects to marketers.
- Lead generation ensures that online consumers are confronted with websites expressly designed to trigger “real-time interactions,” such as chat, call-me-back features, sign-up forms, special offers, and more.

Lead Generation Contributed to the Financial Collapse of 2008



- **Lead generation played a critical, largely invisible role in the subprime mortgage debacle** to identify candidates for subprime loans. Google, Yahoo, and others raked in substantial revenues during the housing loan frenzy (charging as much as \$20 to \$30 per click for keywords such as “mortgage” and “refinance”).
- At the height of the boom in the U.S., from 2005 to 2007, mortgage and financial services companies were among the top spenders for online ads. **Countrywide Mortgage doubled** online spending from \$18.3 M to \$35.5 M and LowRateSource went from \$17.9 M to \$51.7 M.
- **LowerMyBills**, at the time an Experian property, was the “nation’s largest online financial services advertiser” in 2005.

Today, Lead Gen Includes Numerous Name Brand & Off-Brand Websites

Brand Names include Bankrate.com, Zillow, Lending Tree

- In 2011, Bankrate.com “generated more than 24 million offer clicks to issuers. It also sold 18 million leads to 20,000 agents and 75 carriers.
- Leads are generated both within the Bankrate.com site and also through its extensive online network (including **creditcard.com**, interest.com, and others).
- In addition to its own tracking and analysis of its online users’ behavior, Bankrate.com works with major, but little known, online scoring companies TARGUSinfo and eBureau to identify leads more precisely for targeting.



The search “I need a payday loan” takes you to one of many **Off-Brand** “Lead Generator” pages where you become a “lead” sold for \$9-30, to the highest bidder in a “reverse auction.”

The screenshot shows the website for "Pay Loan Today .com". The navigation bar includes "Payday Home", "Payday Loans", "About", "How it works", and "Applications". The main content area features a smiling woman on a headset. To her left, a list of benefits includes: "Approval in seconds", "No credit check", "No paperwork", and "High approval rate". To her right, a green box highlights a "3 minute application" process to "Get a loan now". Below this, there is a "Select State..." dropdown menu and a "\$ 300" dropdown menu. A large blue button with a checkmark says "APPLY NOW". At the bottom of the main content area, a blue bar shows a three-step process: "1 APPLY NOW Online application", "2 GET APPROVED Online processing", and "3 GET FUNDS Direct deposit". Below the main content area, a green banner reads "Guaranteed Pay Loans with no Teletrack". At the very bottom, a grey bar contains the text: "When one needs money fast to deal with any kind of urgent and unexpected expenses as soon as possible, payday loans prove a good".

II. Other Online Profiling/Data Collection Practices



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on 3 June 2014, Ed Mierzwinski, U.S. PIRG

As the New York Times explained, PIRG/CDD uncovered use of invisible to consumer E-Scores, predictive financial algorithms and other scoring products, with impact on all—but esp. low income consumers.

Secret E-Scores Chart Consumers' Buying Power



Tim Gruber for The New York Times

Gordy Meyer, chief executive of eBureau, in its data processing center. EBureau calculates consumers' buying-power scores, which take into account details like occupation, salary, home value and spending patterns.

By NATASHA SINGER
Published: August 18, 2012

ST. CLOUD, Minn.

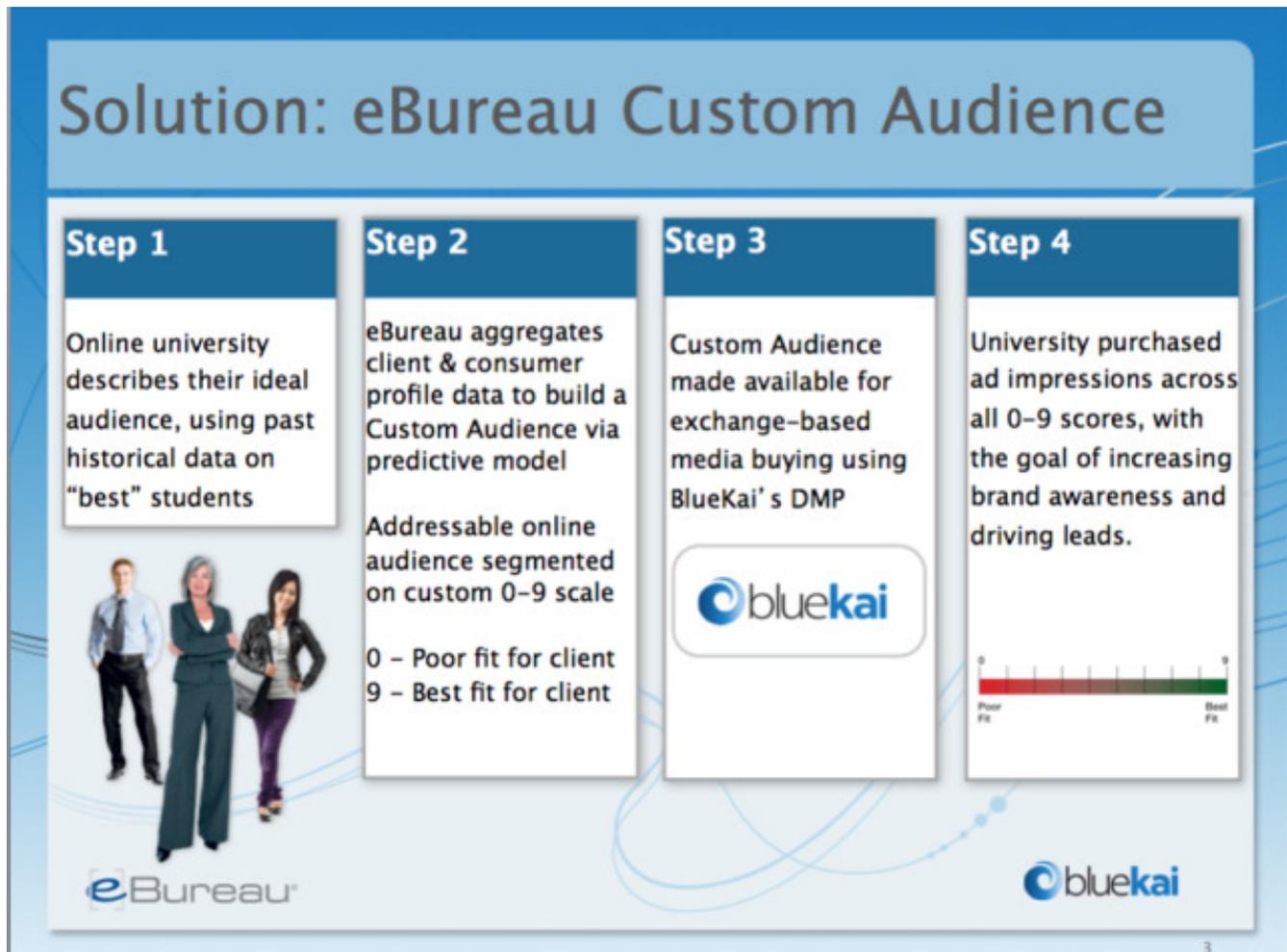
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You for Sale: AMERICANS are obsessed with their scores. Credit scores.

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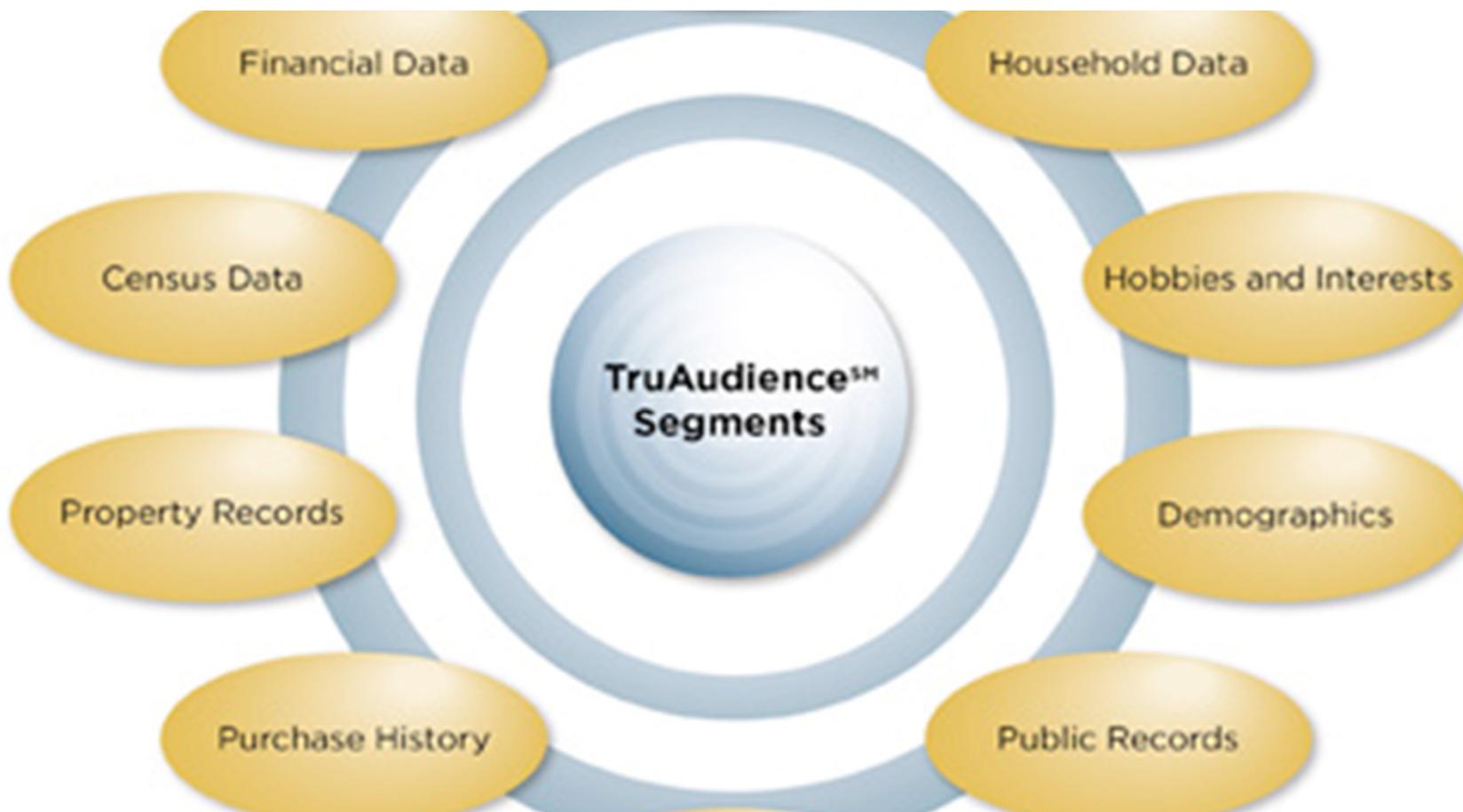
“These digital scores, known broadly as consumer valuation or buying-power scores, measure our potential value as customers. What’s your e-score? You’ll probably never know. ...

... The result is a private, digital ranking of American society unlike anything that has come before.”

Example: eBureau's score product for an online for-profit university. Invisible, non-transparent, unaccountable. Such scores can be used to determine pricing, including discriminatory pricing.



Digital E-Scores can be used to determine pricing or service; or even whether you are offered a product at all.



These powerful new capabilities have tremendous impact on consumers, esp. low-income/at risk or vulnerable populations. Data can be used to manipulate choices or offers or pricing structures



DATA SHEET

Ideal Audience: Underbanked Consumers

Overview

TruSignal's Underbanked Consumer Ideal Audience includes people who have similar characteristics of consumers who maintain nontraditional banking relationships. This segment is valuable for advertisers looking to reach consumers using money transfer services, applying for short term loans or prepaid debit card products through online channels.

Built Using Real World Performance Data

TruSignal Ideal Audiences go beyond rudimentary demographics or pre-canned segments. By analyzing underbanked consumers with TruSignal's massive store of third party data, we discovered a proprietary formula of 127 predictors. Together, these data attributes detect which consumers are likely to use money transfer services, short term loans and prepaid debit card products. We used this audience formula to profile more than 100,000,000 US adult consumers, giving you all of the power and precision of many datasets distilled into a single, targetable audience.

Top Predictive Factors:

- Length at residence
- Estimated home value
- Not owner occupied residence
- Musical tastes
- Financial strength

Dynamic Pricing Based On E-Scores: Fair or Unfair?



- **FTC Data Broker Report: May 2014:** “the scoring processes used in some marketing products are not transparent ... consumers are unable to take actions that might mitigate the negative effects of lower scores, such as being limited to ads for subprime credit or receiving different levels of service from companies.”
- **Professor Joseph Turow, “The Daily You”, 2012:** “Turow describes how our personal "reputations" related to our identity are being constructed by others--all out of the control of the individual. Some of us are regarded, he explains, as "waste"--because our incomes or life conditions may not make some marketer the profit they desire. We are secretly being labeled by others with various digital "scarlet letters" symbolizing our worth to the commercial marketplace (and the political one as well).”
- **Turow, “Niche Envy,” 2010:** Merchants consider the online environment particularly ripe for such “*dynamic pricing*”—that is, for *price discrimination* driven by behavioral targeting.

III. Firms Claim We Have No Consumer Rights



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on 3 June 2014, Ed Mierzwinski, U.S. PIRG

Companies Claim Consumers Don't Have Rights On Internet

- Data broker industry is largely unregulated.
- Firms claim they are ad servers or data brokers or in any case are not credit bureaus subject to FCRA because information that they collect and sell is used **only to serve ads**, not to make transactional decisions.
- Firms on internet claim financial information used is **not about individual consumers**, but is at “neighborhood” or other general level, failing to meet FCRA thresholds.

Firms Claim Exemption From FCRA Or Ignore It

	FCRA	Big Data On Internet
General Use Limitation for Decisions About Consumers	Use Only For Credit, Employment or Insurance or a Benefit Consumer Applies For	None, Profiles and Scores Generated and Used for Any Purpose
Consumer Rights	Obtain free copy, dispute, correct	None by law
Business Responsibilities	Bureaus must keep reports accurate and secure. Furnishers and users have responsibilities, too.	None except as described in privacy policies. Various networks buy/sell/share/mix consumer data in real time.
Uses for Marketing: called “prescreening” in the FCRA	Prescreening limited to Credit or Insurance, Consumer Can Opt Out	Any use allowed; online scoring and targeting is replacing prescreening.
Credit Scores	Some rights to obtain actual scores free or to purchase “educational” credit scores	E-scores secret

IV. Communities of Color a Key Target



Multicultural targeting of Hispanics is a key element of the online ecosystem.



HISPANICS SPEND LESS TIME WATCHING TV AND MORE ONLINE



- **On average, weekly time spent with the Internet across all screens exceeds the amount of time spent watching TV - This is true for Hispanics and non-Hispanics**

Media Consumption Average number of hours spent weekly

- Hispanics spend less time watching TV vs. Non-Hispanic: 8.3 hours vs. 10.9 hours
- Hispanics spend more time on Internet across all screens (8.7 hours) vs. TV (8.3 hours)
- Hispanics spend more time on mobile phone vs. non-Hispanic: 4.1 hours vs. 3.6 hours

**8.7 hrs on Internet
across all screens**

**4.1 hrs
on mobile**



Source: 2012 Terra Hispanic Digital Consumer Study
by comScore

More multi-cultural targeting is aimed at African-Americans

5 digital truths about African Americans

Click on Sign to add text and place signatures on a PDF file.

-  African Americans are ahead of the digital curve, utilizing video, mobile, and other platforms to interact online
-  African Americans are vocal – digital is their microphone
-  African Americans are avid searchers
-  African Americans are more thorough in their pre-purchase research
-  African Americans are more receptive to digital marketing

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US consumers face fundamental changes to how they buy and pay for products and services.

Mobile is key: geolocation and geofencing data are key

3. Mobile devices are at forefront of marketing



- Mobile use among teens (and children) soaring
- African American and Hispanic teens – greater use & engagement
- 24/7 accessibility
- Geolocation, geofencing, geomapping
- Coupons, social check-ins
- Point of influence linked with point of purchase



V. Where Do We Go From Here?



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Potential Benefits of Big Data to Underserved Communities

- New sources of lending for low-income consumers
- Greater opportunity to control expenditures through mobile phone use, including discounts
- Ability to comparison shop for best price
- More affordable and competitive products and services



Excerpts from Recommendations of our report w/ CDD



The Need for Public Education, Transparency, and Advocacy

- The next several years are a critical transition period to ensure that unbanked and underbanked Americans.
- We believe that the new financial marketplace can operate in a fair and equitable manner, helping to generate opportunities to promote economic security for individuals and communities. [...]



Safeguards Needed

- Public education and industry engagement are essential.
- Also need federal and state safeguards against unfair practices as well as policies that encourage asset-building, budgeting, financial inclusion and opportunity.
- Working with Americans for Financial Reform and others, the CFPB and FTC should be encouraged to review the products and services that comprise the contemporary underbanked financial marketplace.
- Rules governing data collection, profiling, and targeting of vulnerable consumers should be implemented.





More Recommendations

- Groups should propose agency review of the FCRA/ECOA to ensure protection against both current and emerging practices.
- New safeguards to protect consumer privacy should also be recommended, including addressing the needs of youth.
- Groups should also develop a strategy to encourage the Federal Communications Commission (FCC) to use its authority to **promote affordable access to mobile devices** and develop consumer protection standards.
- **Investigate dynamic pricing (and weblining -- some consumers get only adverse offers).**



Coming in September...

FTC to Examine Effects of Big Data on Low Income and Underserved Consumers at September Workshop

Public Workshop Will Address Latest Technology Developments, Societal Benefits and Concerns, and Hear From Academics, Business and Industry Representatives

The Federal Trade Commission will host a public workshop entitled “Big Data: A Tool for Inclusion or Exclusion?” **in Washington on Sept. 15, 2014**, to further explore the use of “big data” and its impact on American consumers, including low income and underserved consumers.



Thank You

Contact: Ed Mierzwinski, 202-461-3821 or edm@pirg.org

Some joint research w/ Jeff Chester, Center for Digital Democracy, is below.



**Big Data Means Big Opportunities and Big Challenges:
Promoting Financial Inclusion and Consumer Protection in the “Big Data”
Financial Era, released March 2014**

Released by: U.S. PIRG Education Fund and Center for Digital Democracy

<http://www.uspirgedfund.org/news/usf/new-report-examines-promise-and-potential-dangers-new-financial-marketplace> or <http://bit.ly/1pL2MZk>

**Selling Consumers Not Lists: The New World of Digital Decision-Making and the Role of
the Fair Credit Reporting Act, Mierzwinski, Ed and Chester, Jeff**

Suffolk University Law Review, Dec 2013, No. 3, Vol. 46

<http://suffolklawreview.org/selling-consumers-not-lists/>

This research was funded by the Ford Foundation and the Annie E. Casey Foundation. We thank them for their support but acknowledge that the findings and conclusions presented in these reports are those of the authors alone, and do not necessarily reflect the opinions of the Foundations.

Weblining and Other Racial Justice Concerns in the Era of Big Data

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June 3, 2014

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The logo for the National Consumer Law Center (NCLC) is located in the bottom right corner. It consists of the acronym "NCLC" in a large, blue, serif font, with a registered trademark symbol (®) to its upper right. Below this, the words "NATIONAL CONSUMER LAW CENTER" are stacked in a smaller, blue, sans-serif font, with a registered trademark symbol (®) to the right of "CENTER". Two thin, horizontal yellow lines are positioned above and below the text "NATIONAL CONSUMER LAW CENTER".

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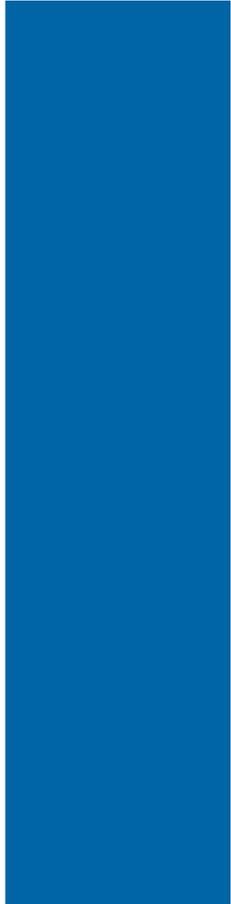
“All data is credit data.”
--Douglas Merrill, CEO of ZestFinance



<https://tinyurl.com/Underwriting4Underbanked>

Watch 1:58-2:48

CRITIQUE OF STATUS QUO



Racial Disparities in FICO

Study after study finds certain minority communities have lower scores as a group

- 2012 CFPB Report
 - Median FICO score for majority minority areas was 34 - vs. 52 for low minority areas
- 2009 Woodstock Institute report
- 2007 Federal Reserve Board report to Congress.
 - Mean score of African Americans was half that of whites (54.0 out of 100 for whites versus 25.6 for African Americans) with Hispanics mean of 38.2.
- 2007 Federal Trade Commission study
 - African Americans and Hispanics strongly over-represented in the lowest scoring categories.

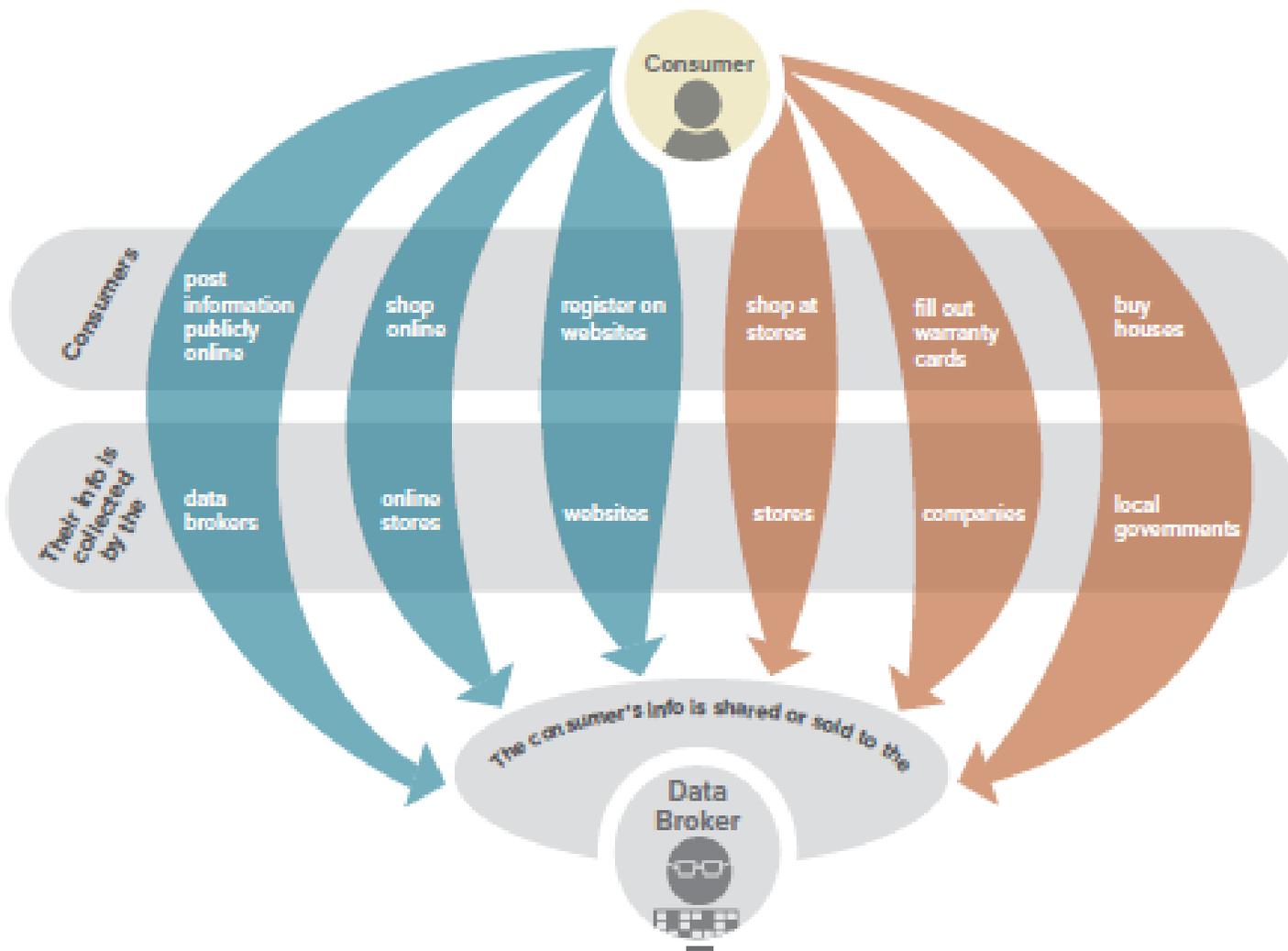
Racial Disparities (cont.)

- 2006 Brookings study
- 2004 Study by Federal Reserve researchers
- 2004 Harvard Joint Center for Housing Studies study
- 2004 Texas Department of Insurance study
- 1997 Fair Isaac analysis
- 1996 Freddie Mac study
 - African-Americans were three times as likely to have FICO scores below 620 as whites.
 - Hispanics are twice as likely as whites to have FICO scores under 620.

NCLC's Interest: Big Data in Consumer Lending

- Integrity of the Process
 - Accountability of the algorithm
 - Accuracy of data
 - Discriminatory impact
- Resulting products
 - Are they really better for consumers?
- Compliance with the consumer protection laws, e.g.:
 - Fair Credit reporting Act
 - Equal Credit Opportunity Act
 - Reg. B (implements ECOA)

IS BIG DATA DISCRIMINATORY?



Source: FTC, Data Brokers: Call for Transparency and Accountability (May 2014)

Potentially discriminatory impact



- White consumers have a higher rate of broadband adoption
- Smartphone is the sole internet connection
 - 30 % of Whites
 - 48 % of Latinos
 - 39 % of Blacks

Potentially discriminatory impact

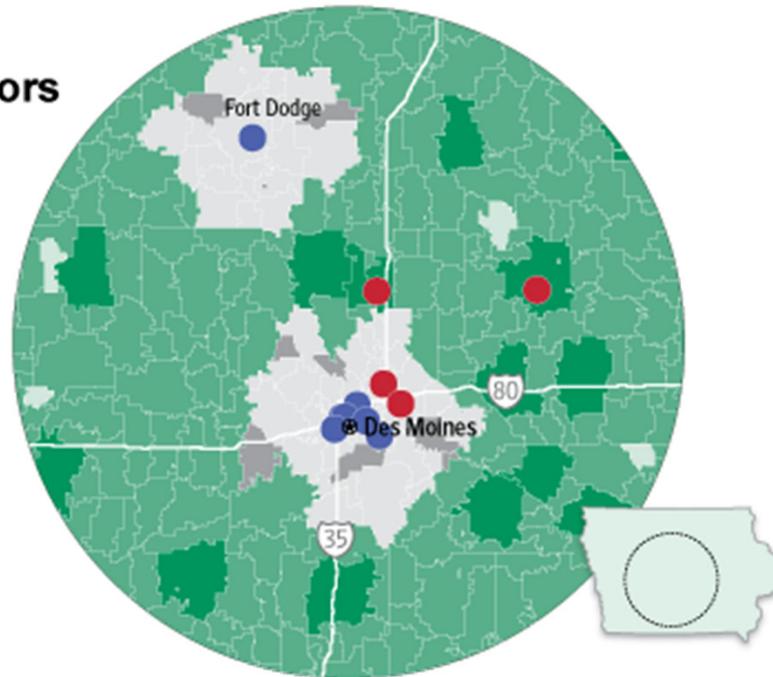
- Staples' website uses your computer's "IP address" to predict your ZIP Code.
- In the WSJ's tests, Staples offered discount prices to some ZIP Codes much more often than others.



Locations of stores relative to price zones

● **Staples**
● **Competitors**

PRICES

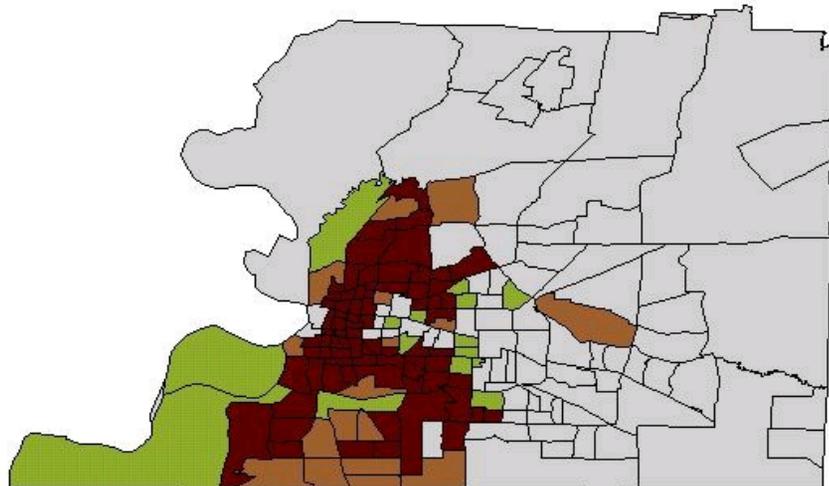


	Product	Discount Price*	High Price	Dollar Difference	Percent Difference
	Swingline Stapler	\$14.29	\$15.79	\$1.50	10.5%
	BIC Rollerball Pens, 12-Pack	\$25.99	\$28.49	\$2.50	9.6%
	Staples-Brand Mailing Tubes, 15-Pack	\$99.99	\$109.99	\$10.00	10.0%

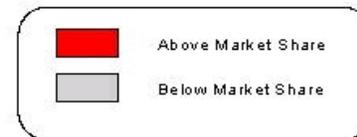
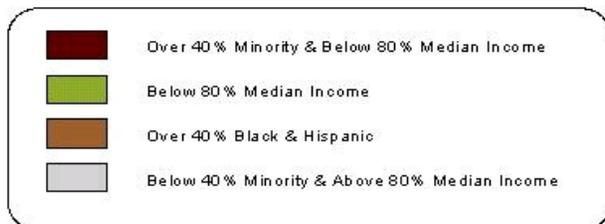
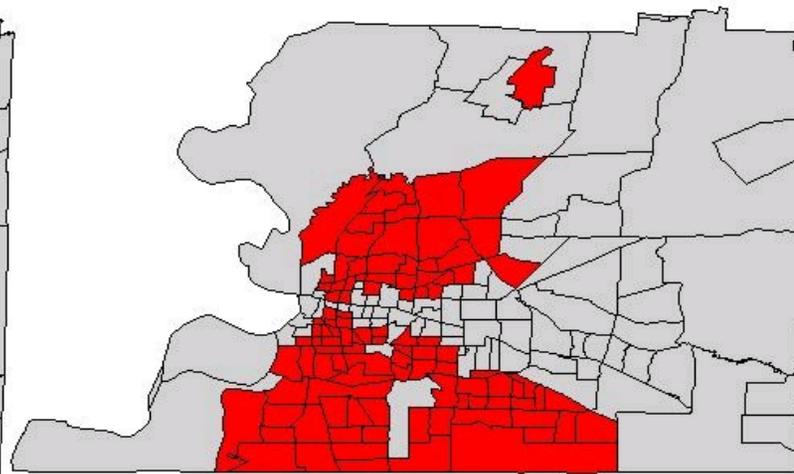
Subprime Loans & Non-White Communities

Subprime Lending Patterns Memphis (Shelby Co.), TN

Minority & Low-Income Tracts

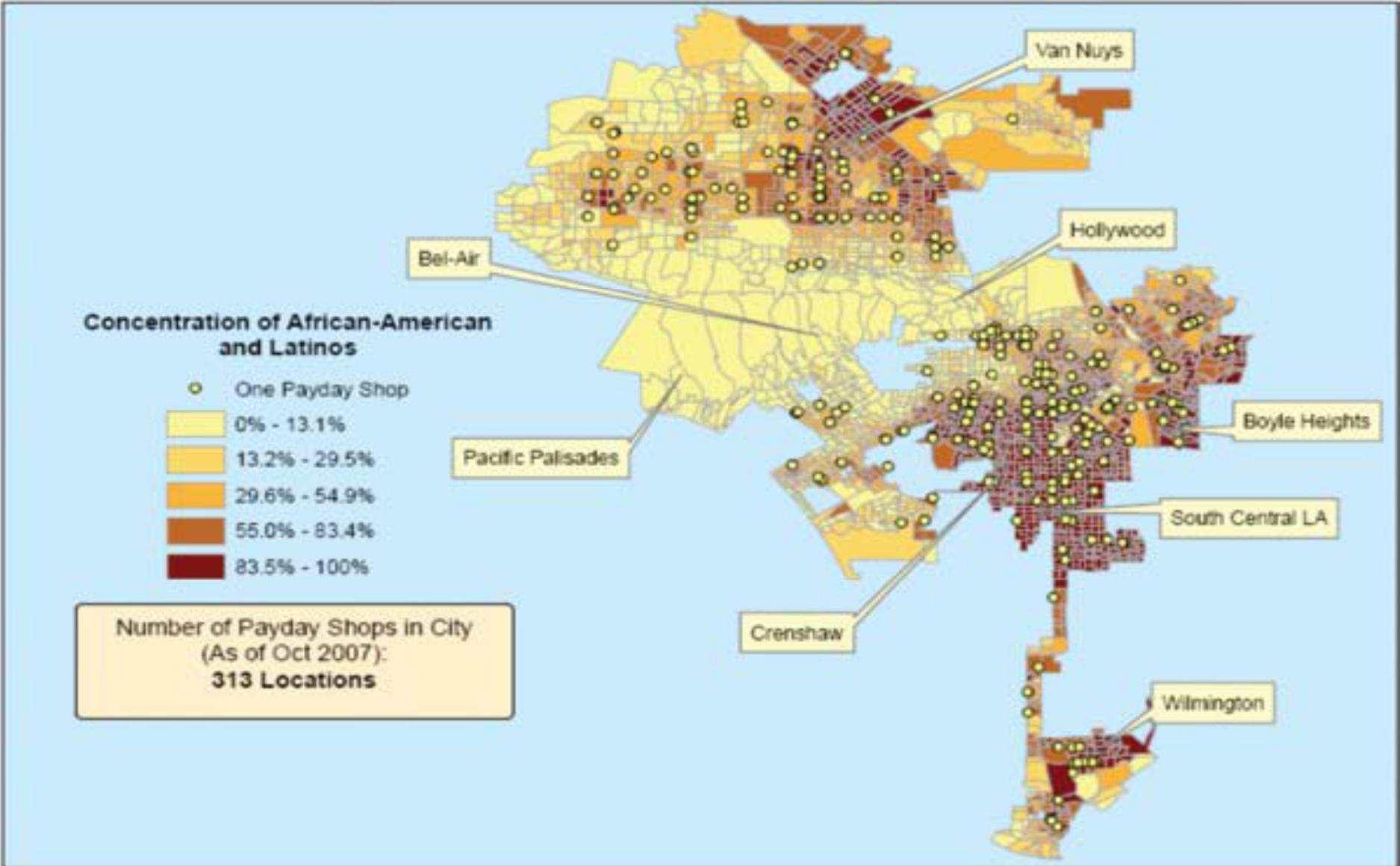


Subprime Lending Concentration



Sources: 2000 U.S. Census; 2002 Home Mortgage Disclosure Act data

Fringe Lenders in Communities of Color



Potentially discriminatory impact

- A recent report by TransUnion:
 - ...aggregated credit data is...helpful to [debt] collectors because it can identify local credit conditions clustered around common demographics.
 - For example, if the consumer is living in a ZIP code where the mortgage delinquency rates are climbing or always high, the chance for collection may be significantly less than for those in ZIP codes where the delinquency rate is relatively low and stable.
- Underwater In Chicago
 - 40.5% of borrowers in predominantly African American communities
 - 40.3% in predominantly Latino communities.
 - 2.5X higher than foreclosures in predominantly white communities.

Source: Jeffrey S. Morrison & Andy Feltovich, "Leveraging Aggregated Credit Data and in Portfolio Forecasting and Collection Scoring," The RMA Journal, Oct. 2010.

Source: Woodstock, Struggling to Stay Afloat: Negative Equity in Communities of Color in the Chicago Six County Region (March 2012).

Potentially discriminatory impact

- American Express lowered a customer's credit limit from \$10,800 to \$3,800 because:
- “[o]ther customers who have used their card at establishments where you recently shopped have a poor repayment history with American Express.”

Source: Lori Andrews, “Facebook Is Using You.” *New York Times* (Feb. 4, 2012).

What does the FTC have to say?

- “[T]he Commission recommends that data brokers take reasonable precautions to ensure that downstream users of their data do not use it for eligibility determinations or for unlawful discriminatory purposes.... Data brokers should help ensure that the information does not unintentionally go to unscrupulous entities that would be likely to use it for unlawful discriminatory purposes. Similarly, data brokers should conduct due diligence to ensure that data that they intend for marketing or risk mitigation purposes is not used to deny consumers credit, insurance, employment, or the like.”

Source: FTC, Data Brokers: Call for Transparency and Accountability (May 2014)

Big Data, Better Products?

PRODUCT	ISSUER	APR
RISE	Think Finance	Varies by state 58% (Georgia only) 125% to 364%
Plain Green	Tribal lending entity using Think Finance platform	Varies by amount 59.84% to 378.95%
Great Plains Lending	Tribal lending entity using Think Finance platform	Varies by amount 349.05% to 448.76%
LendUp	LendUp	Varies by amount 210.48% to 767.54%
Spotloan	Tribal lending entity using ZestFinance platform	Max 390%

Policy Recommendations

- The FTC should continue to study big data brokers and credit scores testing for a potential discriminatory impact.
- The FTC and the CFPB should examine big data brokers for legal compliance with FCRA and ECOA.
- The CFPB should create a mandatory registry for consumer reporting agencies so that consumers can know who has their data.
- The CFPB, in coordination with the FTC, should create regulations based upon the FTC's research that ensure that data brokers operate with transparency and accuracy.
- The CFPB should require all of the financial products it regulates to meet Regulation B's requirements for credit scoring models (essentially requiring that the score does what it is intended to do).

Questions??

The logo for the National Consumer Law Center (NCLC) is located in the bottom right corner. It consists of the acronym "NCLC" in a large, blue, serif font, with a registered trademark symbol (®) to its upper right. Below this, the words "NATIONAL CONSUMER LAW CENTER" are stacked in a smaller, blue, sans-serif font. A thin yellow horizontal line is positioned above the word "NATIONAL" and another thin yellow horizontal line is positioned below the word "CENTER".

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