

**AMENDMENT IN THE NATURE OF A SUBSTITUTE
TO H.R. 5332**

OFFERED BY MR. GOTTHEIMER OF NEW JERSEY

Strike all after the enacting clause and insert the following:

1 SECTION 1. SHORT TITLE; TABLE OF CONTENTS.

2 (a) SHORT TITLE.—This Act may be cited as the
3 “Protecting Your Credit Score Act of 2019”.

4 (b) TABLE OF CONTENTS.—The table of contents for
5 this Act is as follows:

- Sec. 1. Short title; table of contents.
- Sec. 2. Establishment of online consumer portal landing page for consumer access to certain credit information.
- Sec. 3. Accuracy in consumer reports.
- Sec. 4. Improved Dispute Process for Consumer Reporting Agencies.
- Sec. 5. Injunctive relief.
- Sec. 6. Increased transparency.
- Sec. 7. Consumer reporting agency registry.
- Sec. 8. Authority of Bureau with respect to consumer reporting agencies.
- Sec. 9. Bureau standards for protecting nonpublic information.
- Sec. 10. Report on data security risk assessments in examinations of consumer reporting agencies.
- Sec. 11. GAO study on the use of social security numbers.

**6 SEC. 2. ESTABLISHMENT OF ONLINE CONSUMER PORTAL
7 LANDING PAGE FOR CONSUMER ACCESS TO
8 CERTAIN CREDIT INFORMATION.**

9 (a) IN GENERAL.—Section 612(a)(1) of the Fair
10 Credit Reporting Act (15 U.S.C. 1681j(a)(1)) is amended
11 by adding at the end the following:

1 “(D) ONLINE CONSUMER PORTAL LANDING
2 PAGE.—

3 “(i) IN GENERAL.—Not later than 1
4 year after the date of enactment of this
5 subparagraph, each consumer reporting
6 agency described in section 603(p) shall
7 jointly develop an online consumer portal
8 landing page that gives each consumer un-
9 limited free access to—

10 “(I) the consumer report of the
11 consumer;

12 “(II) the means by which the
13 consumer may exercise the rights of
14 the consumer under subparagraph (E)
15 and section 604(e);

16 “(III) the ability to initiate a dis-
17 pute with the consumer reporting
18 agency regarding the accuracy or
19 completeness of any information in a
20 report in accordance with section
21 611(a) or 623(a)(8);

22 “(IV) the ability to place and re-
23 move a security freeze on a consumer
24 report for free under section 605A(i)
25 and (j);

1 “(V) if the consumer reporting
2 agency offers a product to consumers
3 to prevent access to the consumer re-
4 port of the consumer for the purpose
5 of preventing identity theft, a disclo-
6 sure to the consumer regarding the
7 differences between that product and
8 a security freeze as defined under sec-
9 tion 605A(i) or (j);

10 “(VI) information on who has
11 accessed the consumer report of the
12 consumer over the last 24 months,
13 and, as available, for what permissible
14 purpose the consumer report was fur-
15 nished in accordance with section 604
16 and section 609; and

17 “(VII) the credit score of the
18 consumer in accordance with section
19 609(f)(7).

20 “(ii) NO WAIVER.—A consumer re-
21 porting agency described in section 603(p)
22 may not require a consumer to waive any
23 legal or privacy rights to access—

24 “(I) a portal established under
25 this subparagraph; or

1 “(II) any of the services de-
2 scribed in clause (i) that are provided
3 through a portal established under
4 this subparagraph.

5 “(iii) NO ADVERTISING OR SOLICITA-
6 TIONS.—A portal established under this
7 subparagraph may not contain any adver-
8 tising, marketing offers, or other solicita-
9 tions.

10 “(iv) EXTENSION.—The Bureau may
11 allow the consumer reporting agencies an
12 extension of 1 year to develop the online
13 consumer portal landing page required
14 under clause (i).

15 “(v) RULE OF CONSTRUCTION.—
16 Nothing in this subparagraph may be con-
17 strued as requiring a consumer reporting
18 agency to disclose confidential proprietary
19 information through the online consumer
20 portal landing page.

21 “(E) OPT-OUT OPTION.—

22 “(i) IN GENERAL.—If a consumer re-
23 porting agency sells consumer information
24 in a manner that is not included in a con-
25 sumer report, the consumer reporting

1 agency shall provide each consumer with a
2 method (through a website, by phone, or in
3 writing) by which the consumer may elect,
4 free of charge, to not have the information
5 of the consumer so sold.

6 “(ii) NO EXPIRATION.—An election
7 made by a consumer under clause (i) shall
8 expire on the date on which the consumer
9 expressly revokes the election through a
10 website, by phone, or in writing.”.

11 (b) CONFORMING AMENDMENT.—Section 612(f)(1)
12 of the Fair Credit Reporting Act (15 U.S.C. 1681j(f)(1))
13 is amended, in the matter preceding subparagraph (A),
14 by adding “or that is made through the online consumer
15 portal landing page established under subsection
16 (a)(1)(D),” after “subsections (a) through (d),”.

17 **SEC. 3. ACCURACY IN CONSUMER REPORTS.**

18 Section 607(b) of the Fair Credit Reporting Act (15
19 U.S.C. 1681e) is amended to read as follows:

20 “(b) ENSURING ACCURACY.—

21 “(1) IN GENERAL.—In preparing a consumer
22 report, each consumer reporting agency shall follow
23 reasonable procedures to assure maximum possible
24 accuracy of the information concerning the consumer
25 to whom the report relates.

1 “(2) MATCHING INFORMATION IN A FILE.—In
2 assuring the maximum possible accuracy under
3 paragraph (1), each consumer reporting agency de-
4 scribed in section 603(p) shall ensure that, when in-
5 cluding information in the file of a consumer, the
6 consumer reporting agency—

7 “(A) matches all 9 digits of the social se-
8 curity number of the consumer with the infor-
9 mation that the consumer reporting agency is
10 including in the file; or

11 “(B) if a consumer does not have a social
12 security number, matches information that in-
13 cludes the full legal name, date of birth, current
14 address, and at least one former address of the
15 consumer.

16 “(3) PERIODIC AUDITS.—Each consumer re-
17 porting agency shall perform periodic audits, on a
18 schedule determined by the Bureau, on a representa-
19 tive sample of consumer reports of the agency to
20 check for accuracy.”.

21 **SEC. 4. IMPROVED DISPUTE PROCESS FOR CONSUMER RE-**
22 **PORTING AGENCIES.**

23 (a) RESPONSIBILITIES OF FURNISHERS OF INFOR-
24 MATION TO CONSUMER REPORTING AGENCIES.—Section

1 623 of the Fair Credit Reporting Act (15 U.S.C. 1681s–
2 2) is amended—

3 (1) in subsection (a)(8)—

4 (A) in subparagraph (E)(ii), by inserting
5 “and consider” after “review”; and

6 (B) in subparagraph (F)—

7 (i) in clause (i)(II), by inserting “,
8 and does not include any new or additional
9 information that would be relevant to a re-
10 investigation” before the period at the end;
11 and

12 (ii) by adding at the end the following
13 new clause:

14 “(iv) NEW OR ADDITIONAL INFORMA-
15 TION.—For purposes of clause (i)(II), the
16 term ‘new or additional information’—

17 “(I) means information of a type
18 designated by the Bureau; and

19 “(II) does not include informa-
20 tion previously provided to the per-
21 son.”; and

22 (2) in subsection (b)(1), by inserting “and con-
23 sider” after “review”.

24 (b) BUREAU CREDIT REPORTING OMBUDSPERSON.—

25 Section 611(a) of the Fair Credit Reporting Act (15

1 U.S.C. 1681i(a)) is amended by adding at the end the fol-
2 lowing:

3 “(8) BUREAU CREDIT REPORTING
4 OMBUDSPERSON.—

5 “(A) IN GENERAL.—Not later than 180
6 days after the date of enactment of this para-
7 graph, the Bureau shall establish the position
8 of credit reporting ombudsperson, whose spe-
9 cific duties shall include carrying out the Bu-
10 reau’s responsibilities with respect to—

11 “(i) resolving persistent errors that
12 are not resolved in a timely manner by a
13 consumer reporting agency; and

14 “(ii) enhancing oversight of consumer
15 reporting agencies by—

16 “(I) advising the Director of the
17 Bureau, in consultation with the Of-
18 fice of Enforcement and the Office of
19 Supervision of the Bureau, on any po-
20 tential violations of paragraph (5) or
21 any other applicable law by a con-
22 sumer reporting agency, including ap-
23 propriate corrective action for such a
24 violation; and

1 “(II) making referrals to the Of-
2 fice of Supervision for supervisory ac-
3 tion or the Office of Enforcement for
4 enforcement action, as appropriate, in
5 response to violations of paragraph
6 (5) or any other applicable law by a
7 consumer reporting agency.

8 “(B) REPORT.—The ombudsperson shall
9 submit to the Committee on Financial Services
10 of the House of Representatives and the Com-
11 mittee on Banking, Housing, and Urban Affairs
12 of the Senate an annual report including statis-
13 tics and analysis on consumer complaints the
14 Bureau receives relating to consumer reports,
15 as well as a summary of the supervisory actions
16 and enforcement actions taken with respect to
17 consumer reporting agencies during the year
18 covered by the report.”.

19 (c) RESPONSIBILITIES OF CONSUMER REPORTING
20 AGENCIES.—Section 611 of the Fair Credit Reporting Act
21 (15 U.S.C. 1681i) is amended—

22 (1) in subsection (a)—

23 (A) in paragraph (1), by adding at the end
24 the following:

1 “(D) OBLIGATIONS OF CONSUMER RE-
2 PORTING AGENCIES RELATING TO REINVES-
3 TIGATIONS.—Commensurate with the volume
4 and complexity of disputes about which a con-
5 sumer reporting agency receives notice, or rea-
6 sonably anticipates to receive notice, under this
7 paragraph, each consumer reporting agency
8 shall—

9 “(i) maintain sufficient personnel to
10 conduct reinvestigations of those disputes;
11 and

12 “(ii) provide training with respect to
13 the personnel described in clause (i).”;

14 (B) in paragraph (6)(B)—

15 (i) by amending clause (ii) to read as
16 follows:

17 “(ii) a copy of the consumer’s file and
18 a consumer report that is based upon such
19 file as revised, including a description of
20 the specific modification or deletion of in-
21 formation, as a result of the reinvestiga-
22 tion;”;

23 (ii) by striking clause (iii) and redesi-
24 gnating clauses (iv) and (v) as clauses (vi)
25 and (vii), respectively;

1 (iii) by inserting after clause (ii) the
2 following:

3 “(iii) a description of the actions
4 taken by the consumer reporting agency
5 regarding the dispute;

6 “(iv) if applicable, contact information
7 for any furnisher involved in responding to
8 the dispute and a description of the role
9 played by the furnisher in the reinvestiga-
10 tion process;

11 “(v) the options available to the con-
12 sumer if the consumer is dissatisfied with
13 the result of the reinvestigation, includ-
14 ing—

15 “(I) submitting documents in
16 support of the dispute;

17 “(II) adding a consumer state-
18 ment of dispute to the file of the con-
19 sumer pursuant to subsection (b);

20 “(III) filing a dispute with the
21 furnisher pursuant to section
22 623(a)(8); and

23 “(IV) submitting a complaint
24 against the consumer reporting agen-
25 cy or furnishers through the consumer

1 complaint database of the Bureau or
2 the State attorney general for the
3 State in which the consumer resides;”;
4 and

5 (C) by striking paragraph (7) and redesignig-
6 nating paragraph (8) as paragraph (7); and

7 (D) in paragraph (7), as so redesignated,
8 by striking “paragraphs (2), (6), and (7)” and
9 inserting “paragraphs (2) and (6)”; and
10 (2) by adding at the end the following new sub-

11 section:

12 “(h) NOTIFICATION OF DELETION OF INFORMA-
13 TION.—A consumer reporting agency described in section
14 603(p) shall communicate with other consumer reporting
15 agencies described in section 603(p) to ensure that a dis-
16 pute initiated with one consumer reporting agency is noted
17 in a file maintained by such other consumer reporting
18 agencies.”.

19 **SEC. 5. INJUNCTIVE RELIEF.**

20 The Fair Credit Reporting Act (15 U.S.C. 1681 et
21 seq.) is amended—

22 (1) in section 616 (15 U.S.C. 1681n)—

23 (A) in subsection (a), by amending the
24 subsection heading to read as follows: “DAM-
25 AGES”;

1 (B) by redesignating subsections (c) and
2 (d) as subsections (d) and (e), respectively; and
3 (C) by inserting after subsection (b) the
4 following:

5 “(c) INJUNCTIVE RELIEF.—

6 “(1) IN GENERAL.—In addition to any other
7 remedy under this section, a court may award in-
8 junctive relief to require compliance with the re-
9 quirements imposed under this title with respect to
10 any consumer.

11 “(2) ATTORNEY’S FEES.—In the event of any
12 successful action for injunctive relief under this sub-
13 section, a court may award to the prevailing party
14 reasonable attorney’s fees (as determined by the
15 court) incurred by the prevailing party during the
16 action.”; and

17 (2) in section 617 (15 U.S.C. 1681o)—

18 (A) in subsection (a), in the subsection
19 heading, by striking “(a) IN GENERAL.—” and
20 inserting “(a) DAMAGES.—”;

21 (B) by redesignating subsection (b) as sub-
22 section (c); and

23 (C) by inserting after subsection (a) the
24 following:

25 “(b) INJUNCTIVE RELIEF.—

1 “(1) IN GENERAL.—In addition to any other
2 remedy under this section, a court may award in-
3 junctive relief to require compliance with the re-
4 quirements imposed under this title with respect to
5 any consumer.

6 “(2) ATTORNEY’S FEES.—In the event of any
7 successful action for injunctive relief under this sub-
8 section, a court may award to the prevailing party
9 reasonable attorney’s fees (as determined by the
10 court) incurred by the prevailing party during the
11 action.”.

12 (3) ENFORCEMENT.—Section 615(h)(8) of the
13 Fair Credit Reporting Act (15 U.S.C. 1681m(h)(8))
14 is amended—

15 (A) in subparagraph (A), by striking “sec-
16 tion” and inserting “subsection”; and

17 (B) in subparagraph (B), by striking “This
18 section” and inserting “This subsection”.

19 **SEC. 6. INCREASED TRANSPARENCY.**

20 (a) DISCLOSURES TO CONSUMERS.—Section 609 of
21 the Fair Credit Reporting Act (15 U.S.C. 1681g) is
22 amended—

23 (1) in subsection (a)(3)(B)—

24 (A) in clause (i), by striking “and” at the
25 end; and

1 (B) by striking clause (ii) and inserting the
2 following:

3 “(ii) the address and telephone number of
4 the person; and

5 “(iii) the permissible purpose, as available,
6 of the person for obtaining the consumer re-
7 port, including the specific type of credit prod-
8 uct that is extended, reviewed, or collected, as
9 described in section 604(a)(3)(A).”;

10 (2) in subsection (f)—

11 (A) by amending paragraph (7)(A) to read
12 as follows:

13 “(A) supply the consumer with a credit
14 score through the portal established under sec-
15 tion 612(a)(1)(D) or upon request by the con-
16 sumer, as applicable, that—

17 “(i) is derived from a credit scoring
18 model that is widely distributed to users by
19 that consumer reporting agency for the
20 purpose of any extension of credit or other
21 transaction designated by the consumer
22 who is requesting the credit score; or

23 “(ii) is widely distributed to lenders of
24 common consumer loan products and pre-

1 dicts the future credit behavior of the con-
2 sumer; and”]; and

3 (B) in paragraph (8), by inserting “, ex-
4 cept that a credit score shall be provided free
5 of charge to the consumer if requested in con-
6 nection with a free annual consumer report de-
7 scribed in section 612(a) or through the online
8 consumer portal landing page established under
9 section 612(a)(1)(D)” before the period at the
10 end; and

11 (3) in subsection (g)(1)—

12 (A) in subparagraph (A)(ii)—

13 (i) in the clause heading, by striking
14 “SUBPARAGRAPH (D)” and inserting “SUB-
15 PARAGRAPH (C)”]; and

16 (ii) by striking “subparagraph (D)”
17 and inserting “subparagraph (C)”];

18 (B) in subparagraph (B)(ii), by striking
19 “consistent with subparagraph (C)”];

20 (C) by striking subparagraph (C); and

21 (D) by redesignating subparagraphs (D)
22 through (G) as subparagraphs (C) through (F),
23 respectively.

24 (b) NOTIFICATION REQUIREMENTS.—

25 (1) ADVERSE INFORMATION NOTIFICATION.—

1 (A) IN GENERAL.—The Fair Credit Re-
2 porting Act (15 U.S.C. 1681 et seq.) is amend-
3 ed—

4 (i) in section 612 (15 U.S.C. 1681j),
5 by striking subsection (b) and inserting the
6 following:

7 “(b) FREE DISCLOSURE AFTER NOTICE OF AD-
8 VERSE ACTION OR OFFER OF CREDIT ON MATERIALLY
9 LESS FAVORABLE TERM.—Not later than 30 days after
10 the date on which a consumer reporting agency receives
11 a notification under subsection (a)(2) or (h)(6) of section
12 615, or from a debt collection agency affiliated with the
13 consumer reporting agency, the consumer reporting agen-
14 cy shall make to a consumer, without charge to the con-
15 sumer, all disclosures that are made to a user of a con-
16 sumer report in accordance with the rules prescribed by
17 the Bureau.”; and

18 (ii) in section 615(a) (15 U.S.C.
19 1681m(a))—

20 (I) by redesignating paragraphs
21 (2), (3), and (4) as paragraphs (3),
22 (4), and (5), respectively;

23 (II) by inserting after paragraph
24 (1) the following:

1 “(2) direct the consumer reporting agency that
2 provided the consumer report that was used in the
3 decision to take the adverse action to provide the
4 consumer with the disclosures described in section
5 612(b);” and

6 (III) in paragraph (5), as so re-
7 designated—

8 (aa) in the matter preceding
9 subparagraph (A), by striking
10 “of the consumer’s right”;

11 (bb) by striking subpara-
12 graph (A) and inserting the fol-
13 lowing:

14 “(A) that the consumer shall receive a
15 copy of the consumer report with respect to the
16 consumer, free of charge, from the consumer
17 reporting agency that furnished the consumer
18 report; and” and

19 (cc) in subparagraph (B), by
20 inserting “of the right of the con-
21 sumer” before “to dispute”.

22 (B) CONFORMING AMENDMENT.—Section
23 604(b)(2)(B)(i) of the Fair Credit Reporting
24 Act (15 U.S.C. 1681b(b)(2)(B)(i)) is amended

1 by striking “section 615(a)(3)” and inserting
2 “section 615(a)(4)”.

3 (2) NOTIFICATION IN CASES OF LESS FAVOR-
4 ABLE TERMS.—Section 615(h) of the Fair Credit
5 Reporting Act (15 U.S.C. 1681m(h)) is amended—

6 (A) in paragraph (1), by striking “para-
7 graph (6)” and inserting “paragraph (7)”;

8 (B) in paragraph (2), by striking “para-
9 graph (6)” and inserting “paragraph (7)”;

10 (C) in paragraph (5)(C), by striking “may
11 obtain” and inserting “shall receive”;

12 (D) by redesignating paragraphs (6), (7),
13 and (8) as paragraphs (7), (8), and (9), respec-
14 tively; and

15 (E) by inserting after paragraph (5) the
16 following:

17 “(6) REPORTS PROVIDED TO CONSUMERS.—A
18 person who uses a consumer report as described in
19 paragraph (1) shall notify and direct the consumer
20 reporting agency that provided the consumer report
21 to provide the consumer with the disclosures de-
22 scribed in section 612(b).”.

23 (3) NOTIFICATION OF SUBSEQUENT SUBMIS-
24 SIONS OF NEGATIVE INFORMATION.—Section
25 623(a)(7)(A)(ii) of the Fair Credit Reporting Act

1 (15 U.S.C. 1681s–2(a)(7)(A)(ii)) is amended by
2 striking “with respect to” and all that follows
3 through the period at the end and inserting “without
4 providing additional notice to the consumer, unless
5 another person acquires the right to repayment con-
6 nected to the additional negative information. The
7 acquiring person shall be subject to the requirements
8 of this paragraph and shall be required to send con-
9 sumers the written notices described in this para-
10 graph, if applicable.”.

11 **SEC. 7. CONSUMER REPORTING AGENCY REGISTRY.**

12 Section 621 of the Fair Credit Reporting Act (15
13 U.S.C. 1681s) is amended by adding at the end the fol-
14 lowing:

15 “(h) CONSUMER REPORTING AGENCY REGISTRY.—

16 “(1) ESTABLISHMENT OF REGISTRY.—Not later
17 than 180 days after the date of enactment of this
18 subsection, the Bureau shall establish a publicly
19 available registry of consumer reporting agencies
20 that includes—

21 “(A) each consumer reporting agency that
22 compiles and maintains files on consumers on a
23 nationwide basis;

24 “(B) each nationwide specialty consumer
25 reporting agency;

1 “(C) all other consumer reporting agencies
2 that are not included under section 603(p) or
3 603(x); and

4 “(D) links to any relevant websites of a
5 consumer reporting agency described under
6 subparagraphs (A) through (C).

7 “(2) REGISTRATION REQUIREMENT.—The Bu-
8 reau shall establish a deadline, which shall be not
9 later than 270 days after the date of the enactment
10 of this subsection, by which each consumer reporting
11 agency described in paragraph (1) shall be required
12 to register in the registry established under such
13 paragraph.”.

14 **SEC. 8. AUTHORITY OF BUREAU WITH RESPECT TO CON-**
15 **SUMER REPORTING AGENCIES.**

16 Section 1024(a)(1) of the Dodd-Frank Wall Street
17 Reform and Consumer Protection Act (12 U.S.C.
18 5514(a)(1)) is amended—

19 (1) in subparagraph (D), by striking “or” at
20 the end;

21 (2) in subparagraph (E), by striking the period
22 at the end and inserting “; or”; and

23 (3) by adding at the end the following new sub-
24 paragraph:

1 “(F) is a consumer reporting agency de-
2 scribed under section 603(p) of the Fair Credit
3 Reporting Act.”.

4 **SEC. 9. BUREAU STANDARDS FOR PROTECTING NON-**
5 **PUBLIC INFORMATION.**

6 Title V of the Gramm-Leach-Bliley Act (15 U.S.C.
7 6801 et seq.) is amended—

8 (1) in section 501, by adding at the end the fol-
9 lowing new subsection:

10 “(c) CONSUMER REPORTING AGENCY SAFE-
11 GUARDS.—The Bureau of Consumer Financial Protection
12 shall establish, by rule, appropriate standards for con-
13 sumer reporting agencies described under section 603(p)
14 of the Fair Credit Reporting Act relating to administra-
15 tive, technical, and physical safeguards to protect records
16 and information as described in paragraphs (1) through
17 (3) of subsection (b).”;

18 (2) in section 504(a)(1)(A), by striking “, ex-
19 cept that the Bureau of Consumer Financial Protec-
20 tion shall not have authority to prescribe regulations
21 with respect to the standards under section 501”;
22 and

23 (3) in section 505(a)(8), by inserting “, other
24 than under subsection (c) of section 501” after “sec-
25 tion 501”.

1 **SEC. 10. REPORT ON DATA SECURITY RISK ASSESSMENTS**
2 **IN EXAMINATIONS OF CONSUMER REPORT-**
3 **ING AGENCIES.**

4 Not later than 90 days after the date of the enact-
5 ment of this Act, the Director of the Bureau of Consumer
6 Financial Protection shall assess whether examinations
7 conducted by the Director of consumer reporting agencies
8 described under section 603(f) of the Fair Credit Report-
9 ing Act (15 U.S.C. 1681a(f)) include sufficient processes
10 to addresses any data security risks to the consumers of
11 such agencies on which such agencies maintain and com-
12 pile files. Along with the first semiannual report required
13 under section 1016(b) of the Consumer Financial Protec-
14 tion Act of 2010 (12 U.S.C. 5496(b)) to be submitted
15 after the 90-day period after the date of the enactment
16 of this Act, the Director shall submit to Congress a report
17 containing the results of such assessment that includes—

- 18 (1) recommendations for improving the proc-
19 esses to addresses any such data security risks; and
20 (2) the progress of the Director on making any
21 improvements described under paragraph (1).

22 **SEC. 11. GAO STUDY ON THE USE OF SOCIAL SECURITY**
23 **NUMBERS.**

24 (a) **STUDY.**—The Comptroller General of the United
25 States shall carry out a study on the feasibility and means
26 of consumer reporting agencies replacing the use of social

1 security numbers as identifiers with another type of Fed-
2 eral identification.

3 (b) REPORT.—Not later than the end of the 2-year
4 period beginning on the date of the enactment of this Act,
5 the Comptroller General shall issue a report to the Con-
6 gress containing all findings and determinations made in
7 carrying out the study required under subsection (a).

