



Experian
900 17th Street NW, Suite 1050
Washington, DC 20006
202 682 4610 T
www.experian.com

September 25, 2015

The Honorable Fred Upton
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
2322A Rayburn House Office Building
Washington, DC 20515

The Honorable Michael Burgess
Chairman
Commerce, Manufacturing and Trade Subcommittee
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Jan Schakowsky
Ranking Member
Commerce, Manufacturing and Trade Subcommittee
U.S. House of Representatives
2322A Rayburn House Office Building
Washington, DC 20515

Dear Representatives Upton, Pallone, Burgess and Schakowsky:

On behalf of Experian and our more than 6,000 US employees, I am writing about the establishment of a national database of vehicle identification numbers (VINs) as proposed in the discussion draft of the Improving Recall Tracking Act.

Experian Automotive provides information services to the automobile industry so that manufacturers, dealers, lenders, auctions, and consumers can understand the market, the vehicles and the people who buy them. Our North American Vehicle DatabaseSM houses data on more than 700 million vehicles. Experian Automotive's AutoCheck[®] vehicle history reports provide dealers and consumers with in-depth information, allowing them to confidently understand, compare and select the right vehicles. Experian Automotive also provides to manufacturers the tools to manage a recall. For this last reason, we would like to comment on this legislation.

Private companies have already developed an effective recall tracking system that identifies the most current registered owner of a vehicle and a best address. This bill would require the federal government to expend resources to develop a public sector database that already exists in the private sector and relies on private funds. Moreover, we suspect that the government would find it challenging to incorporate the sophisticated analytics, thousands of additional data sources, and innovations that private businesses are already motivated to include. Instead, policymakers should try to understand why a significant minority of car owners do not respond to safety recall notices by taking their vehicles for service. The public policy response should focus on those issues.

Private sector companies are already providing effective services

While we share your view that more can be done to improve the motor vehicle safety recall completion rates, Congress does not need to pass legislation creating a government database when there are already private sector companies providing this information to auto manufacturers.

Experian Automotive incorporates motor vehicle records and other data into several services that provide consumers, businesses, and state and national law enforcement agencies with important information about vehicle histories and registrations. Experian Automotive's North American Vehicle Database, along with Experian's credit, consumer and business information assets, helps meet the industry's growing demand for an integrated information source.

As proposed in the draft legislation, the public database would only include state motor vehicle information (i.e. make, model and year of manufacturer; name and address of person to whom the car is registered). This information and more are already included in databases maintained by businesses like Experian Automotive. For example, our North American Vehicle Database contains title and registration data - including vehicle identification number, title and transfer, registration and renewal, vehicle specifications, brand, and name and address - from a variety of public sources including the 50 states, the District of Columbia, Puerto Rico and Canada.

The federal government does not have the same resources or incentives to develop innovative recall notification systems

Private sector companies like Experian Automotive bring considerable experience and proprietary data that the public sector would be left without should it be required to develop a national safety recall database. For example, Experian Automotive does not rely solely on state motor vehicle records, which may be incomplete or outdated, when assisting auto manufacturers with a safety recall. Instead, we are able to integrate proprietary data, as well as other public record information beyond motor vehicle records, to complement the state motor vehicle data that we receive. We also clean up incorrect information to ensure that the data is accurate and that the right consumers receive the correct safety recall notice in a timely and effective manner.

In fact, federal law already requires states to provide vehicle registration information for safety recalls. Specifically, the Driver's Privacy Protection Act mandates that state departments of motor vehicles (DMVs) *shall* provide vehicle registration information for recall purposes. In the area of safety recalls, the law compels states to provide registration information, so the legal mechanism exists to identify the vast majority of car owners.

Identifying the current owners of vehicles subject to recall can be challenging because each state maintains vehicle registrations subject to their respective state laws. Furthermore, the information technology systems vary widely state by state according to their respective needs. This heterogeneity makes it difficult to compile this information into a single nationwide database, and the private sector has and continues to innovate to find ways to overcome these obstacles at no cost to the federal government.

Efforts should focus on understanding why consumers do not respond to recalls

Because of work done by companies like Experian Automotive, automobile manufacturers are able to identify and locate vehicle owners with a high rate of accuracy when they need to conduct safety recalls. Therefore the question is not so much about locating the owner but rather understanding why the owners who receive the notices do not take their vehicles to have the safety defect repaired. As we all know, it can sometimes be difficult to make time to take your car to a dealership and have maintenance done to the vehicle, especially if the recall notice does not appear to be an urgent problem that prevents the vehicle from functioning properly. Policymakers should also work with the National Highway Traffic Safety Administration and other stakeholders to refine incentives for consumers to respond to safety recalls in a timely fashion.

Experian Letter re: Discussion Draft of the Improving Recall Tracking Act

September 25, 2015

Page 3

Experian looks forward to working with the Committee as it continues to consider this important issue. Please do not hesitate to reach out to me if you or your staff has any further questions.

Respectfully,

A handwritten signature in black ink that reads "Tony Hadley". The signature is written in a cursive style with a long horizontal line extending from the top of the "T".

Tony Hadley

Senior Vice President

Government Affairs and Public Policy