

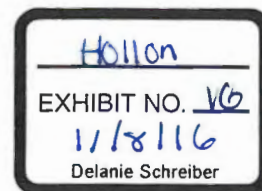
EXHIBIT 19

(A-20)

2015 Metro 2 Guidelines

2015 Credit Reporting Resource Guide[®]

CREDIT REPORTING RESOURCE GUIDE
Copyright 2015 © Consumer Data Industry Association



EXP/RFlorence 001071

CONSUMER DATA INDUSTRY ASSOCIATION (CDIA) END USER LICENSE AGREEMENT TERMS AND CONDITIONS

1. **LICENSE GRANT.** Conditioned on your continued compliance with the terms and conditions of this License Agreement, this License Agreement provides you, **as an individual**, with a **personal**, revocable, limited, non-exclusive, and nontransferable license to use the Credit Reporting Resource Guide® (CRRG®) for your informational and internal business purposes only. The foregoing grant permits you to download a single electronic copy to a single computer or laptop and also print a single hard copy of the CRRG® from a single computer or laptop, provided that such copy contains all applicable proprietary notices. Notwithstanding the foregoing, any rights granted hereby are licensed and not sold or otherwise transferred or assigned to you or any third party.
2. **LICENSE GRANT RESTRICTIONS.** Except as provided above, you may not modify, alter, translate, create derivative work(s) of, distribute, display, broadcast, transmit, reproduce, publish, license, sub-license, sell, exploit, rent, lease, grant a security interest in, assign or transfer any right(s) in, or otherwise use in any manner not expressly permitted herein the CRRG® or any part thereof. Specifically, you expressly agree that you are not using the CRRG® for competitive reasons (against Consumer Data Industry Association (CDIA)) or for the purpose of designing or developing similar materials. In addition, you may not remove or alter any proprietary notice on the CRRG® **or use any portion of the CRRG® independently from the CRRG® as a whole.** All rights not expressly granted to you herein are hereby reserved to CDIA.
3. **USER OBLIGATIONS.** By installing, downloading, accessing, and/or using the CRRG®, you represent that you are of the legal age to create a binding agreement with CDIA and agree to abide by all applicable local, state, national, and international laws and regulations with respect to your use of the CRRG®. You also agree to assume all responsibility concerning your use of the CRRG®, including meeting any requirements or obligations of your contracts with third parties. CDIA assumes no responsibility or liability for any claims that may result directly or indirectly from the communications, agreements, or interactions you establish with third parties using the CRRG®.
4. **PROPRIETARY RIGHTS.** CDIA or its licensors shall retain all ownership right, title, and interest, including, without limitation, all associated intellectual property or proprietary rights, in and to all text, graphics, methodologies, processes, procedures, content, products, information, and documentation associated with the CRRG® as well as its design, structure, "look and feel," and arrangement of any content contained on or available through the CRRG®. The "Credit Reporting Resource Guide®" and its contents are © Consumer Data Industry Association and/or its licensors. All rights reserved. CREDIT REPORTING RESOURCE GUIDE®, CONSUMER DATA INDUSTRY ASSOCIATION, CDIA, and all other names, logos, and icons identifying CDIA and its products and services are proprietary trademarks of CDIA, and any use of such marks without the express written permission of CDIA is strictly prohibited. Except as expressly provided herein, CDIA does not grant any express or implied right to you or any other person under any intellectual or proprietary rights.

5. **CONFIDENTIALITY.** You acknowledge and agree that the certain parts of the CRRG® contain proprietary trade secrets and confidential information of CDIA (the "Confidential Information"). You agree to secure and protect the confidentiality of this Confidential Information of CDIA in a manner consistent with the maintenance of CDIA's rights therein, using at least as great a degree of care as you use to maintain the confidentiality of your own confidential information of a similar nature, but in no event using less than reasonable efforts. You shall not, nor permit any third party to, sell, transfer, publish, disclose, or otherwise make available any portion of the Confidential Information to third parties, except as expressly authorized in this License Agreement.
6. **SUBMISSIONS.** CDIA welcomes your feedback and suggestions about how to improve the CRRG®. You agree that CDIA shall have the perpetual, royalty-free, and irrevocable right to use such feedback and suggestions in any manner it deems desirable without providing any consideration, attribution, or payment to you.
7. **DISCLAIMER.** ALTHOUGH CDIA HAS USED COMMERCIALY REASONABLE EFFORTS TO PROVIDE ACCURATE INFORMATION, NEITHER CDIA NOR THE CRRG® OFFERS ANY LEGAL OR OTHER PROFESSIONAL ADVICE. CDIA ALSO MAKES NO REPRESENTATIONS OR WARRANTIES ABOUT THE SUITABILITY, COMPLETENESS, TIMELINESS, RELIABILITY, LEGALITY, OR ACCURACY OF THE CRRG® FOR ANY PURPOSE. THE CRRG® IS PROVIDED "AS IS" WITHOUT WARRANTY OF ANY KIND, INCLUDING, WITHOUT LIMITATION, ALL IMPLIED WARRANTIES AND CONDITIONS OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, TITLE, AND NON-INFRINGEMENT AS WELL AS ANY WARRANTY RELATED TO THE USE, OR THE RESULTS OF THE USE, OF THE CRRG®. THE ENTIRE RISK AS TO THE QUALITY OF AND RESULTS FROM THE USE OF THE CRRG® IS WITH YOU, AND YOU SHOULD NOT RELY ON ANY CONTENT IN THE CRRG® AS THE SOLE BASIS FOR ACTION OR ASSUME THAT ANY TACTICS DESCRIBED THEREIN WOULD, BY THEMSELVES, ACHIEVE A PARTICULAR RESULT. IF ANY OF THE DISCLAIMERS OR EXCLUSIONS SET FORTH IN THIS SECTION ARE DETERMINED BY A COURT OF COMPETENT JURISDICTION TO BE UNENFORCEABLE, THEN ALL SUCH EXPRESS AND IMPLIED WARRANTIES AND CONDITIONS PERMITTED BY LAW SHALL BE LIMITED IN DURATION FOR A PERIOD OF 30 DAYS AFTER THE EFFECTIVE DATE OF THIS AGREEMENT AND NO WARRANTIES OR CONDITIONS SHALL APPLY AFTER THAT PERIOD.
8. **LIMITATION OF LIABILITY.** YOU AGREE THAT IN NO EVENT SHALL CDIA BE LIABLE FOR ANY INDIRECT, PUNITIVE, INCIDENTAL, SPECIAL, OR CONSEQUENTIAL DAMAGES ARISING OUT OF OR IN ANY WAY CONNECTED WITH THE USE OF THE CRRG® BY YOU OR ANYONE ELSE, WHETHER BASED IN CONTRACT, TORT, STRICT LIABILITY, OR OTHERWISE, EVEN IF CDIA HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES. WITHOUT LIMITATION OF THE FOREGOING, THE TOTAL LIABILITY OF CDIA FOR ANY REASON WHATSOEVER RELATED TO USE OF THE CRRG®, INCLUDING FOR ANY INACCURACIES IN THE CRRG®, OR FOR ANY CLAIMS RELATING TO THIS LICENSE AGREEMENT SHALL NOT EXCEED \$1,000 (USD).
9. **INDEMNITY.** You agree to defend, indemnify, and hold harmless CDIA and its affiliates, employees, licensors, agents, directors, officers, partners, representatives, shareholders, attorneys, predecessors, successors, and assigns from and against any and all claims, proceedings, damages, injuries, liabilities, losses, costs, and expenses (including reasonable attorneys' fees and litigation expenses) relating to or arising from your use of the CRRG® and any breach by you of this License Agreement.

10. **GOVERNING LAW.** This License Agreement has been made in and will be construed and enforced solely in accordance with the laws of the District of Columbia as applied to agreements entered into and completely performed in the District of Columbia. Any dispute, controversy, or claim between the parties arising out of or in connection with this License Agreement as to its conclusion, existence, validity, interpretation, performance, or non-performance, breach, termination, and the assessment of damages including claims in tort whether arising before or after the termination of the License Agreement shall be resolved in accordance with this License Agreement. You also agree that any action to enforce this License Agreement will be brought solely in the federal or state courts in the District of Columbia, and all parties to this License Agreement expressly agree to be subject to the jurisdiction of such courts.
11. **TERM AND TERMINATION.** This License Agreement and your right to use the CRRG® will take effect at the moment you click "I ACCEPT" or you install, download, access, or use the CRRG®, whichever occurs first, and is effective until terminated as set forth below. This License Agreement will terminate automatically if you click "I REJECT" or if you fail to comply with any of the terms and conditions described herein, including by exceeding the scope of the license. Termination or expiration of this License Agreement will be effective without notice. You may also terminate at any time by ceasing to use the CRRG®, but all applicable provisions of this License Agreement will survive termination, as outlined below. Upon termination or expiration, any right to use the CRRG® will immediately cease and you must return, destroy, or delete from your system all copies of the CRRG® (and any associated materials) in your possession. The miscellaneous provisions as well as the provisions concerning CDIA's proprietary rights, submissions, confidentiality, indemnity, disclaimers of warranty and liability, termination, and governing law, however, will survive the termination or expiration of this License Agreement for any reason.
12. **MISCELLANEOUS.** The parties agree that this License Agreement is for the benefit of the parties hereto. Failure to insist on strict performance of any of the terms and conditions of this License Agreement will not operate as a waiver of that or any subsequent default or failure of performance. A printed version of this License Agreement and of any related notice given in electronic form shall be admissible in judicial or administrative proceedings based upon or relating to this License Agreement to the same extent and subject to the same conditions as other business documents and records originally generated and maintained in printed form. No joint venture, partnership, employment, alliance, or agency relationship exists between you and CDIA as result of this License Agreement or your utilization of the CRRG®. Moreover, you may not bind CDIA in any way or otherwise make any representations or statements for or on behalf of CDIA without CDIA's separate, express, and written permission. This License Agreement represents the entire agreement between you and CDIA with respect to use of the CRRG® and it supersedes all prior or contemporaneous communications and proposals, whether electronic, oral, or written between you and CDIA with respect to the CRRG®. If any provision of this License Agreement is held by a court of competent jurisdiction to be contrary to law, such provision shall be changed and interpreted so as to best accomplish the objectives of the original provision to the fullest extent allowed by law and the remaining provisions of this License Agreement will remain in full force and effect. This License Agreement and any rights granted by CDIA may not be assigned or transferred by you without the prior express written consent of CDIA. If you have any questions regarding this License Agreement, the CRRG®, or other CDIA products or services, please contact CDIA at 1090 Vermont Avenue, NW, Suite 200, Washington, DC 20005, or www.cdiaonline.org.

Table of Contents

RESPONSIBILITIES AND ROLES	1-1
Responsibilities	1-1
Roles - CDIA, Consumer Reporting Agencies, Metro 2® Format Task Force, e-OSCAR® System Support Team, Data Furnisher, Consumer Financial Protection Bureau, Federal Trade Commission	1-2
INDUSTRY STANDARDS	
AUTOMATED DATA REPORTING	2-1
Features of the Metro 2® Format	2-1
Industry Reporting Standards	2-2
Industry Standard for Reporting Account Delinquency	2-2
Accuracy and Integrity Definitions	2-3
Maintaining Accuracy, Integrity and Consistency of Credit Information	2-3
QUICK REFERENCE GUIDE TO INDUSTRY STANDARDS	2-4
Banking/Savings & Loan/Credit Union/ Installment Loan & Line of Credit	2-4
Child Support Agencies	2-5
Credit Cards (non-Retail Cards)	2-6
Debt Buyers/Collection Agencies	2-7
Loan Finance Companies	2-8
Mortgage Lending	2-9
Retail Accounts (store exclusive)	2-11
Sales Finance Companies	2-12
Student Loan Reporters	2-13
Utility Companies	2-14
METRO 2® FORMAT	3-1
Business Requirements	3-1
Metro 2® Training	3-2
Programming Standards	3-3
Production Tips	3-5

Table of Contents

RECORD LAYOUTS	3-6
Header Record — Character Format	3-7
426 Base Segment — Character Format	3-8
J1 Segment — Associated Consumer — Same Address	3-10
J2 Segment — Associated Consumer — Different Address	3-11
K1 Segment — Original Creditor Name	3-12
K2 Segment — Purchased From/Sold To	3-12
K3 Segment — Mortgage Information	3-13
K4 Segment — Specialized Payment Information	3-13
L1 Segment — Account Number/Identification Number Change	3-14
N1 Segment — Employment	3-14
Trailer Record — Character Format	3-15
Header Record — Packed Format	3-17
366 Base Segment — Packed Format	3-18
Trailer Record — Packed Format	3-20

FIELD DEFINITIONS

HEADER RECORD	4-1
Block Descriptor Word (BDW)	4-1
Record Descriptor Word (RDW)	4-1
Record Identifier	4-1
Cycle Identifier	4-2
Innovis Program Identifier	4-2
Equifax Program Identifier	4-2
Experian Program Identifier	4-2
TransUnion Program Identifier	4-2
Activity Date	4-2
Date Created	4-2
Program Date	4-2
Program Revision Date	4-3
Reporter Name	4-3
Reporter Address	4-3
Reporter Telephone Number	4-3
Software Vendor Name	4-3
Software Version Number	4-3
MicroBilt/PRBC Program Identifier	4-3
Reserved	4-3

Table of Contents

BASE SEGMENT	4-4
Block Descriptor Word (BDW)	4-4
Record Descriptor Word (RDW)	4-4
Processing Indicator	4-4
Time Stamp	4-5
Correction Indicator	4-5
Identification Number	4-6
Cycle Identifier	4-6
Consumer Account Number	4-6
Portfolio Type	4-7
Account Type	4-7
Date Opened	4-7
Credit Limit	4-8
Highest Credit or Original Loan Amount	4-8
Terms Duration	4-9
Terms Frequency	4-9
Scheduled Monthly Payment Amount	4-10
Actual Payment Amount	4-10
Account Status	4-11
Payment Rating	4-11
Payment History Profile	4-12
Special Comment	4-13
Compliance Condition Code	4-14
Current Balance	4-15
Amount Past Due	4-15
Original Charge-off Amount	4-15
Date of Account Information	4-16
FCRA Compliance/Date of First Delinquency	4-17
Date Closed	4-18
Date of Last Payment	4-18
Interest Type Indicator	4-18
Reserved	4-18
Consumer Transaction Type	4-18
Surname	4-19
First Name	4-19
Middle Name	4-20
Generation Code	4-20

Table of Contents

BASE SEGMENT (CONTINUED)

Social Security Number	4-20
Date of Birth	4-21
Telephone Number	4-21
ECOA Code	4-21
Consumer Information Indicator	4-22
Country Code	4-22
First Line of Address	4-23
Second Line of Address	4-23
City	4-23
State	4-24
Postal/Zip Code	4-24
Address Indicator	4-24
Residence Code	4-24

J1 SEGMENT

ASSOCIATED CONSUMER – SAME ADDRESS 4-25

Segment Identifier	4-25
Consumer Transaction Type	4-25
Surname	4-26
First Name	4-26
Middle Name	4-26
Generation Code	4-27
Social Security Number	4-27
Date of Birth	4-28
Telephone Number	4-28
ECOA Code	4-28
Consumer Information Indicator	4-29
Reserved	4-29

Table of Contents

J2 SEGMENT

ASSOCIATED CONSUMER – DIFFERENT ADDRESS	4-30
Segment Identifier	4-30
Consumer Transaction Type	4-30
Surname	4-31
First Name	4-31
Middle Name	4-31
Generation Code	4-32
Social Security Number	4-32
Date of Birth	4-33
Telephone Number	4-33
ECOA Code	4-33
Consumer Information Indicator	4-34
Country Code	4-34
First Line of Address	4-35
Second Line of Address	4-35
City	4-35
State	4-36
Postal/Zip Code	4-36
Address Indicator	4-36
Residence Code	4-36
Reserved	4-36

K1 SEGMENT

ORIGINAL CREDITOR NAME	4-37
Segment Identifier	4-37
Original Creditor Name	4-37
Creditor Classification	4-38

K2 SEGMENT

PURCHASED FROM /SOLD TO	4-39
Segment Identifier	4-39
Portfolio Indicator	4-39
Purchased From or Sold To Name	4-39
Reserved	4-39

Table of Contents

K3 SEGMENT

MORTGAGE INFORMATION	4-40
Segment Identifier	4-40
Agency Identifier	4-40
Account Number	4-40
Mortgage Identification Number	4-40

K4 SEGMENT

SPECIALIZED PAYMENT INFORMATION	4-41
Segment Identifier	4-41
Specialized Payment Indicator	4-41
Deferred Payment Start Date	4-41
Balloon Payment Due Date	4-41
Balloon Payment Amount	4-41
Reserved	4-41

L1 SEGMENT

ACCOUNT NUMBER/IDENTIFICATION NUMBER CHANGE	4-42
Segment Identifier	4-42
Change Indicator	4-42
New Consumer Account Number	4-42
New Identification Number	4-43
Reserved	4-43

N1 SEGMENT

EMPLOYMENT	4-44
Segment Identifier	4-44
Employer Name	4-44
First Line of Employer Address	4-44
Second Line of Employer Address	4-44
Employer City	4-44
Employer State	4-44
Employer Postal/Zip Code	4-44
Occupation	4-45
Reserved	4-45

Table of Contents

TRAILER RECORD	4-46
Record Descriptor Word (RDW)	4-46
Record Identifier	4-46
Total Base Records	4-46
Reserved	4-46
Total of Status Code DF	4-46
Total Associated Consumer Segments (J1)	4-46
Total Associated Consumer Segments (J2)	4-46
Block Count	4-46
Total of Status Code DA	4-46
Total of Status Code 05	4-46
Total of Status Code 11	4-46
Total of Status Code 13	4-47
Total of Status Code 61	4-47
Total of Status Code 62	4-47
Total of Status Code 63	4-47
Total of Status Code 64	4-47
Total of Status Code 65	4-47
Total of Status Code 71	4-47
Total of Status Code 78	4-47
Total of Status Code 80	4-47
Total of Status Code 82	4-47
Total of Status Code 83	4-47
Total of Status Code 84	4-47
Total of Status Code 88	4-47
Total of Status Code 89	4-48
Total of Status Code 93	4-48
Total of Status Code 94	4-48
Total of Status Code 95	4-48
Total of Status Code 96	4-48
Total of Status Code 97	4-48
Total of ECOA Code Z (All Segments)	4-48
Total Employment Segments	4-48
Total Original Creditor Segments	4-48
Total Purchased From/Sold To Segments	4-48

Table of Contents

TRAILER RECORD (CONTINUED)

Total Mortgage Information Segments	4-48
Total Specialized Payment Information Segments	4-48
Total Change Segments	4-48
Total Social Security Numbers (All Segments)	4-49
Total Social Security Numbers (Base Segments)	4-49
Total Social Security Numbers (J1 Segments)	4-49
Total Social Security Numbers (J2 Segments)	4-49
Total Dates of Birth (All Segments)	4-49
Total Dates of Birth (Base Segments)	4-49
Total Dates of Birth (J1 Segments)	4-49
Total Dates of Birth (J2 Segments)	4-49
Total Telephone Numbers (All Segments)	4-49
Reserved	4-49

EXHIBITS	5-1
Exhibit 1 — Account Type Codes by Industry	5-1
Exhibit 2 — Account Type Codes within Portfolio Type	5-7
Exhibit 3 — Terms/Payment Amount Conversion to Monthly	5-13
Exhibit 4 — Account Status Codes	5-14
Exhibit 5 — Examples of Reporting Payment History Profile	5-16
Exhibit 6 — Special Comment Codes — by Category within Portfolio	5-18
Exhibit 7 — Special Comment Codes	5-26
Exhibit 8 — Compliance Condition Codes	5-31
Exhibit 9 — Explanation and Examples of FCRA Compliance/Date of First Delinquency	5-33
Exhibit 10 — ECOA Codes	5-44
Exhibit 11 — Consumer Information Indicators	5-46
Exhibit 12 — Country Codes	5-49
Exhibit 13 — General Rules for Addresses	5-51
Exhibit 14 — State Codes	5-52
Exhibit 15 — Data Conversion Checklist	5-53
Exhibit 16 — Examples of Record Layouts — Hexadecimal Representation	5-56

Table of Contents

FREQUENTLY ASKED QUESTIONS AND ANSWERS **6-1**

Complete List of Questions	6-1
Segments and Appendages	6-5
BDW / RDW	6-7
Delinquency Reporting	6-7
Cycle Reporting	6-7
Account Status, Payment Rating, Special Comment	6-8
ECOA Requirements	6-9
FCRA Requirements	6-10
Deleting Accounts/Borrowers	6-11
Consumer Information	6-12
Duplicate Tradelines	6-13
First Time Reporters	6-14
Accounts Included in Bankruptcy	6-15
Reporting Scenarios	6-33

GLOSSARY OF TERMS **7-1**

VALIDATION/IMPLEMENTATION CHECKLIST **8-1**

INDUSTRY REPORTING GUIDELINES **9-1**

Child Support Reporting	9-1
Debt Buyer/Third Party Collection Agency Reporting	10-1
Mortgage Loan Modifications	11-1
Student Loan Reporting	12-1
Utility Company Reporting	13-1

e-OSCAR® **14-1**

Consumer Dispute Process	14-1
Automated Consumer Dispute Verification (ACDV)	14-2
ACDV Workflow	14-2
Features of ACDV	14-3
The Update Process	14-4
Automated Universal Data Process via e-OSCAR®	14-4
Features of AUD	14-6

Responsibilities and Roles

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® Validation/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

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.

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
www.experian.com
www.innovis.com
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.

Responsibilities and Roles

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 includes representatives from Equifax, Experian, Innovis and TransUnion.

For information specific to consumer disputes, click on the e-OSCAR® option at 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.

Consumer Financial Protection Bureau (CFPB)

Among its responsibilities, the CFPB writes rules under and enforces the FCRA, and takes consumer complaints related to the FCRA. More information can be found on the internet at <http://www.consumerfinance.gov>.

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.shtm>.

Automated Data Reporting

FEATURES 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.
- 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 the Metro™ Format:
 - Full four digit year
 - New data elements
 - New values
 - 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

- 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 with a zero balance.
- 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. The Due Date for this example is the 15th of each month.

Date of Acct. Info.	Jan. 1	Feb. 1	Mar. 1	Apr. 1
Bills Received	1	2	3	4
Payments Past Due	0	1	2	3
# Days Past Due Date	0	17	45	76
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

ACCURACY AND INTEGRITY DEFINITIONS

The 2010 FACT Act Data Furnisher rules define the term "Accuracy" to mean that information that a furnisher provides to a consumer reporting agency about an account or other relationship with the consumer correctly:

- Reflects the terms of and liability for the account or other relationship;
- Reflects the consumer's performance and other conduct with respect to the account or other relationship; and
- Identifies the appropriate consumer.

The term "Integrity" means that information that a furnisher provides to a consumer reporting agency about an account or other relationship with the consumer:

- Is substantiated by the furnisher's records at the time it is furnished;
- Is furnished in a form and manner that is designed to minimize the likelihood that the information may be incorrectly reflected in a consumer report; and
- Includes credit limit, if applicable and in the furnisher's possession.

MAINTAINING ACCURACY, 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 re-verification 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.

Quick Reference Guide to Industry Standards

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

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Installment Loans and Lines of Credit.

Important Note: Refer to Credit Cards (non-Retail), Student Loans and Mortgages for guidelines 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, 90, 91, 95, 0A, 3A, 6A, 9A, 7B, 0F	15, 43, 47, 7A, 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	11, 13, 61 - 64, 71, 78, 80, 82 - 84, 93, 95 - 97, DA, DF	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, AO, AU, AX, BN, BP, BT, CP Transferred = H, O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH, CM, CN, CO Removal of comment = blank	Closed accounts = M, AP, CI, CJ, CL Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH, CK, CM, CN, CO 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.	1 - 3, 5, 7, T, X, W, Z

Child Support Agencies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Child Support Agencies' accounts.

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
Terms Duration	Base/13	Constant of 001
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 Transferred = 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.)

Credit Cards (non-Retail Cards)

While all applicable fields within the Metro 2[®] Format should be reported, these guidelines provide specific values that apply to Credit Cards.

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	Assigned credit limit, if applicable. Otherwise, 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	11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF	11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF
Special Comment	Base/19	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH, CN, CO Removal of comment = blank	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, CP Transferred = AT, O, AH, AN, BA Other = S, V, AV, AW, CH, CN, CO Removal of comment = blank

Debt Buyers/Collection Agencies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Debt Buyer and Collection Agency accounts.

Field	Segment/ Field #	Debt Buyer/Collection Agency	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 purchased by the debt buyer or placed/assigned to the third party collection agency	Date of the check
Highest Credit/Original Loan Amount	Base/12	Original assigned amount as of the date purchased, placed or assigned	Original amount of the check, excluding fees and interest
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	Date of the first delinquency with the original creditor that led to the account being sold or placed for collection	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, AU, BP Other = S, V, AW Removal of comment = blank	Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, 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 3 and X are not applicable.	ECOA Codes 3, 5, 7 and X are not applicable.
K1 Segment	K1/2 K1/3	Original credit grantor's name Creditor Classification = 01-15 are required. Note: 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.	Original Creditor = Name of the payee Creditor Classification = 01-15 are required. Note: 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.

Loan Finance Companies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Loan Finance companies' accounts.

Important Note: Refer to Credit Cards (non-Retail) for guidelines 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, 90, 91, 95, 0A, 3A, 6A, 9A, 7B, 0F	15, 43, 47, 7A, 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	11, 13, 61 - 64, 71, 78, 80, 82 - 84, 93, 95 - 97, DA, DF	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, AO, AU, AX, BN, BP, BT, CP Transferred = H, O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH, CM, CN, CO Removal of comment = blank	Closed accounts = M, AP, CI, CJ, CL Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, CH, CK, CM, CN, CO 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.	1 - 3, 5, 7, T, X, W, Z

Mortgage Lending

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Mortgage lending.

Field	#	M (Mortgage)	I (Installment)	C (Line of Credit)
Portfolio Type	8			
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 or Original Loan Amt.	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	11, 13, 65, 71, 78, 80, 82-84, 89, 94, DA, DF • 88 (for HUD FHA Title 1 loans) • 97 (Only report when the account does not go through the foreclosure process; but the remaining balance is charged off.) Note: 97 should not be reported when deficiency balance is charged off for accounting and operational purposes. If the lien has been released, report the mortgage as paid.	11, 13, 61-64, 71, 78, 80, 82-84, 93, 95-97, DA, DF 89 and 94 (only for Type 6D Home Equity loans that go through the deed in lieu or foreclosure process)	11, 13, 62, 64, 65, 71, 78, 80, 82-84, 89, 93, 94, 97, DA, DF
Special Comment	19	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, BT, CP Transfer = AT, H, O, AH, AN, BA Other = S, V, AV, AW, BO, CH, CM, CN, CO Removal of comment = blank	Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, AX, BN, BP, BT, CP Transfer = AT, H, O, AH, AN, BA Other = S, V, AV, AW, CH, CM, CN, CO Removal of comment = blank	Closed = M, AP, CJ, CL Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, BT, CP Transfer = AT, O, AH, AN, BA Other = S, V, AV, AW, BO, CH, CK, CM, CN, CO Removal of comment = blank
Compliance Condition Code	20	XB, XC, XF, XG, XH, XR	XB, XC, XF, XG, XH, XR	XA - XJ, XR

Mortgage Lending (continued on next page)

Mortgage Lending*Continued from previous page*

Field	#	M (Mortgage)	I (Installment)	C (Line of Credit)
Portfolio Type	8	F (Fixed) or V (Variable/Adjustable)	If applicable, F (Fixed) or V (Variable/Adjustable)	If applicable, F (Fixed) or V (Variable/Adjustable)
Interest Type Indicator	28	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 4	Agency Identifier = 01 (Fannie Mae) & 02 (Freddie Mac) Secondary Agency Account No. Mortgage Identification Number	Segment not applicable	Segment not applicable
K4 Segment Specialized Payment Info.	2 4 5	Specialized Payment Indicator = 01 Balloon Payment Due Date Balloon Payment Amount	Specialized Payment Indicator = 01 Balloon Payment Due Date Balloon Payment Amount	Specialized Payment Indicator = 01 Balloon Payment Due Date Balloon Payment Amount

Retail Accounts (store exclusive)

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Retail accounts.

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	11, 13, 62, 64, 71, 78, 80, 82-84, 93, 97, DA, DF	11, 13, 61 - 64, 71, 78, 80, 82-84, 93, 95 - 97, DA, DF
Special Comment	Base/19	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BP, BT, CP Transferred = O, AH, AN, AT, BA Other = S, V, AV, AW, AZ, CH Removal of comment = blank	Closed accounts = I Legal Action = AM Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BP, BT, CP 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 Companies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Sales Finance companies' accounts.

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	11, 13, 61 - 64, 71, 78, 80, 82 - 84, 93, 95 - 97, DA, DF	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, AO, AU, AX, BN, BP, BT, CP Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH, CN, CO Removal of comment = blank	Closed accounts = M, AP, BL, CI Legal Action = AM Special Payment Arrangements = B, C, AB, AC, AI, AO, AU, AX, BP, BT, CP Transferred = O, AH, AT, BA Other = S, V, AV, AW, AZ, CH, CN, CO 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

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Student Loans.

Field	#	Lender/Service/Secondary Market		Guaranty Agency / US Dept. of Education
Portfolio Type	8	I (Installment Loan)	C (Line of Credit)	O (Open)
Account Type	9	12 (Education)	15 (Line of Credit)	12 (Education)
Date Opened	10	Date the account was originally opened	Date the account was originally opened	Date the claim was paid to the lender
Credit Limit	11	Zero fill	Assigned credit limit	Zero fill
Highest Credit / Orig. Loan Amt.	12	Original amount of the loan, excluding interest payments	Highest balance ever attained	Claim amount that was paid to the lender
Terms Duration	13	Number of months of the loan	Constant of 'LOC'	'001' (for one payment due as scheduled)
Terms Freq.	14	M (monthly) or D (deferred)	M (monthly) or D (deferred)	Blank fill
Scheduled Monthly Payment Amt.	15	Regular monthly payment	Minimum amount due based on the balance, not including any amounts past due	Zero fill
Account Status	17A	05, 11, 13, 71, 78, 80, 82 - 84, DA, DF For loans guaranteed by government agencies: 88 For loans not guaranteed by government agencies: 62, 64, 93, 97	05, 11, 13, 62, 64, 71, 78, 80, 82 - 84, 93, 97, DA, DF	62, 93, DA, DF
Special Comment	19	Legal Action = AM; Refinanced = AS Special Payment Arrangements = B, C, AB, AC, AI, AU, BP, BT, CP Transferred = O, AH, AL, AN, AT Other = S, V, AV, AW, CH, CO Removal of comment = blank	Closed = M, AP, CJ; Legal Action = AM Special Payment Arrangements = B, C, AC, AI, AU, BT, CP Transferred = O, AH, AL, AT, BA Other = S, V, AV, AW, CH Removal of comment = blank	Legal Action = AM Special Payment Arrangements = B, C, AC, AI, AU, CP Other = S, V, AV, AW, CH Removal of comment = blank
Compliance Cond. Code	20	XB, XC, XF, XG, XH, XR	XA - XJ, 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.	ECOA Code 3 is not applicable.
K1 Segment	K1/2	Segment not applicable	Segment not applicable	Complete name of the lender to whom the claim was paid
K4 Segment (when loan is in deferment)	K4/2 K4/3	Specialized Payment Indicator = 02 Deferred Payment Start Date = date the first payment is due for deferred loans	Specialized Payment Indicator = 02 Deferred Payment Start Date = date the first payment is due for deferred loans	Segment not applicable

Utility Companies

While all applicable fields within the Metro 2® Format should be reported, these guidelines provide specific values that apply to Utility Companies' accounts.

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	11, 13, 61 - 64, 71, 78, 80, 82 - 84, 93, 95 - 97, DA, DF	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, AO, AU, AX, BN, BP, BT, CP 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, AU, BP, CP 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/J10	ECOA Code 3 is not applicable.	ECOA Code 3 is not applicable.

Business Requirements

METRO 2® FORMAT

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), the Equal Credit Opportunity Act (ECOA) and all applicable state laws.
- 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.

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.

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.

Business Requirements

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

METRO 2® TRAINING

Training on the Metro 2® Format is available through the CDIA in three convenient formats: in-person workshops, a self-directed e-Learning course, and topic-based webinars. The CDIA's Metro 2® training programs are the only training options developed by the Metro 2® Format Task Force, comprised of members from Equifax, Experian, Innovis, and TransUnion. Registration for any of these training programs is available through the CDIA's website at www.cdiaonline.org.

- **Metro 2® Workshops:** These two-day workshops provide in-depth training on the standard reporting of consumer credit information to the consumer reporting agencies and focus on the regular automated reporting of new accounts and updates to previously-reported accounts in Metro 2®.
- **Metro 2® e-Learning Course:** This comprehensive e-Learning resource offers detailed guidance on the use of Metro 2® for both veterans and those new to the format. Access is available for a full year and includes interactive guidance on reporting as well as examples of real-world reporting scenarios. Flexible pricing options are available to allow data furnishers to provide training for individuals or large groups of employees.
- **Metro 2® Webinars:** These webinars are conducted by the Metro 2® Format Task Force to provide guidance on specific topics and are available for download after the event date. The webinars are updated periodically and as such may not be available at all times.

For additional information, please contact CDIA Education Services at (202) 408-7408 or by email at cdia_training@cdiaonline.org.

Programming Standards

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.

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

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

Record Layout

426 or 366 Base Segment followed by Appendages in alphabetic sequence. For example:
Base + J1 + J2 + L1

Electronic Transmission

File Name	No spaces or special characters can be included in the File Name.
-----------	-------------------------------------------------------------------

Notes:

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

Refer to Exhibit 16 for Examples of Record Layouts – Hexadecimal Representation.

Programming Standards

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.
- Monetary fields are reported in whole dollars only. Cents should be truncated.
- 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

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 a transmission that was 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 when companies are solely responsible for payments. Business accounts should be reported only when there are also consumers who are personally liable for payments.

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

Refer to Exhibit 15 – Data Conversion Checklist for a useful guide to use in the conversion process.

Record Layouts

Record/Segment	Description
Header Record	Identifies the reporter and activity period.
Base Segment	Contains account information, which applies to all consumers associated to the account. Also contains information specific to the primary consumer. For joint accounts where two or more consumers are contractually responsible, the consumer reported in the Base Segment will be considered primary for reporting purposes.
J1 Segment Associated Consumer – Same Address	Contains information specific to an associated consumer who lives at the same address as the consumer reported in the Base Segment. All account information reported in the Base Segment will be applied to this consumer.
J2 Segment Associated Consumer – Different Address	Contains information specific to an associated consumer who lives at a different address than the consumer reported in the Base Segment. All account information reported in the Base Segment will be applied to this consumer.
K1 Segment Original Creditor Name	Contains the name of the original credit grantor and the creditor's classification. Reported by collection agencies, debt buyers, check guarantee companies, student loan guaranty agencies and the U.S. Department of Education.
K2 Segment Purchased From/Sold To	Contains the name of the company from which an account was purchased or the name of the company to which an account was sold.
K3 Segment Mortgage Information	Contains the Fannie Mae or Freddie Mac loan number associated to a mortgage account and/or the Mortgage Identification Number assigned by MERS.
K4 Segment Specialized Payment Information	Contains additional account information on deferred payments or balloon payments.
L1 Segment Account Number / Identification Number Change	Used to report a new Account Number and/or new Identification Number.
N1 Segment Employment	Contains employment information for the primary consumer reported in the Base Segment.
Trailer Record	Contains various totals of information reported on the file.

Note: Refer to Field Definitions for detailed reporting guidelines.

Record Layouts

Header Record — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
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 Identifier	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	MicroBilt/PRBC Program Identifier	A	10	271-280	AN	4-3
18	Reserved		146	281-426	AN	4-3

Total 426

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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

426 Base Segment — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
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	4-5
5	Identification Number	Y	20	21-40	AN	4-6
6	Cycle Identifier	A	2	41-42	AN	4-6
7	Consumer Account Number	Y	30	43-72	AN	4-6
8	Portfolio Type	Y	1	73	AN	4-7
9	Account Type	Y	2	74-75	AN	4-7
10	Date Opened	Y	8	76-83	N	4-7
11	Credit Limit	A	9	84-92	N	4-8
12	Highest Credit or Original Loan Amount	Y	9	93-101	N	4-8
13	Terms Duration	Y	3	102-104	AN	4-9
14	Terms Frequency	A	1	105	AN	4-9
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	A	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

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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

426 Base Segment — Character Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
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	Interest Type Indicator		1	214	AN	4-18
28A	Reserved		16	215-230	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	4-20
33	Generation Code	A	1	297	AN	4-20
34	Social Security Number	HR	9	298-306	N	4-20
35	Date of Birth	HR	8	307-314	N	4-21
36	Telephone Number		10	315-324	N	4-21
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

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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

J1 Segment Associated Consumer — Same Address

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
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	4-26
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	4-27
7	Social Security Number	HR	9	70-78	N	4-27
8	Date of Birth	HR	8	79-86	N	4-28
9	Telephone Number		10	87-96	N	4-28
10	ECOA Code	Y	1	97	AN	4-28
11	Consumer Information Indicator	A	2	98-99	AN	4-29
12	Reserved		1	100	AN	4-29

Total 100

¹ 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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

J2 Segment Associated Consumer — Different Address

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-30
2	Consumer Transaction Type		1	3	AN	4-30
3	Surname	Y	25	4-28	AN	4-31
4	First Name	Y	20	29-48	AN	4-31
5	Middle Name	A	20	49-68	AN	4-31
6	Generation Code	A	1	69	AN	4-32
7	Social Security Number	HR	9	70-78	N	4-32
8	Date of Birth	HR	8	79-86	N	4-33
9	Telephone Number		10	87-96	N	4-33
10	ECOA Code	Y	1	97	AN	4-33
11	Consumer Information Indicator	A	2	98-99	AN	4-34
12	Country Code		2	100-101	AN	4-34
13	First Line of Address	Y	32	102-133	AN	4-35
14	Second Line of Address	A	32	134-165	AN	4-35
15	City	Y	20	166-185	AN	4-35
16	State	Y	2	186-187	AN	4-36
17	Postal/Zip Code	Y	9	188-196	AN	4-36
18	Address Indicator		1	197	AN	4-36
19	Residence Code		1	198	AN	4-36
20	Reserved		2	199-200	AN	4-36

Total 200

¹ 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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

K1 Segment Original Creditor Name

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-37
2	Original Creditor Name	Y	30	3-32	AN	4-37
3	Creditor Classification	F	2	33-34	N	4-38

Total 34

K2 Segment Purchased Portfolio/Sold To

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-39
2	Portfolio Indicator	Y	1	3	N	4-39
3	Purchased Portfolio or Sold To Name	Y	30	4-33	AN	4-39
4	Reserved		1	34	AN	4-39

Total 34

¹ Required fields: Y = Yes, Field is always required; F = Field is required. 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

K3 Segment Mortgage Information

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

Total 40

K4 Segment Specialized Payment Information

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-41
2	Specialized Payment Indicator	Y	2	3-4	N	4-41
3	Deferred Payment Start Date	A	8	5-12	N	4-41
4	Balloon Payment Due Date	A	8	13-20	N	4-41
5	Balloon Payment Amount	A	9	21-29	N	4-41
6	Reserved		1	30	AN	4-41

Total 30

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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

L1 Segment

Account Number/Identification Number Change

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-42
2	Change Indicator	Y	1	3	N	4-42
3	New Consumer Account Number	A	30	4-33	AN	4-42
4	New Identification Number	A	20	34-53	AN	4-43
5	Reserved		1	54	AN	4-43

Total 54

N1 Segment

Employment

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Segment Identifier	Y	2	1-2	AN	4-44
2	Employer Name	Y	30	3-32	AN	4-44
3	First Line of Employer Address		32	33-64	AN	4-44
4	Second Line of Employer Address		32	65-96	AN	4-44
5	Employer City		20	97-116	AN	4-44
6	Employer State		2	117-118	AN	4-44
7	Employer Postal/Zip Code		9	119-127	AN	4-44
8	Occupation	A	18	128-145	AN	4-45
9	Reserved		1	146	AN	4-45

Total 146

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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Character Format

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

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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Character Format

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

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

² Recording Technique: AN = Alphanumeric; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

Header Record — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
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 Identifier	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	MicroBilt/PRBC Program Identifier	A	10	271-280	AN	4-3
18	Reserved		86	281-366	AN	4-3

Total 366

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

² Recording Technique: AN = Alphanumeric; B = Binary; N = Numeric

³ Refer to definitions for field descriptions.

Record Layouts

366 Base Segment — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
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	4-5
5	Identification Number	Y	20	15-34	AN	4-6
6	Cycle Identifier	A	2	35-36	AN	4-6
7	Consumer Account Number	Y	30	37-66	AN	4-6
8	Portfolio Type	Y	1	67	AN	4-7
9	Account Type	Y	2	68-69	AN	4-7
10	Date Opened	Y	5	70-74	P	4-7
11	Credit Limit	A	5	75-79	P	4-8
12	Highest Credit or Original Loan Amount	Y	5	80-84	P	4-8
13	Terms Duration	Y	3	85-87	AN	4-9
14	Terms Frequency	A	1	88	AN	4-9
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	A	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

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

² Recording Technique: AN = Alphanumeric; B = Binary; N = Numeric; P = Packed

³ Refer to definitions for field descriptions.

Record Layouts

366 Base Segment — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
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	Interest Type Indicator		1	165	AN	4-18
28A	Reserved		16	166-181	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	4-20
33	Generation Code	A	1	248	AN	4-20
34	Social Security Number	HR	5	249-253	P	4-20
35	Date of Birth	HR	5	254-258	P	4-21
36	Telephone Number		6	259-264	P	4-21
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

¹ 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

² Recording Technique: AN = Alphanumeric; P = Packed

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Packed Format

FIELD	FIELD NAME	REQUIRED ¹	LENGTH	POSITION	RECORDING TECHNIQUE ²	DESCRIPTION PAGE NUMBER ³
1	Record Descriptor Word (RDW)	Y	4	1-4	B	4-46
2	Record Identifier	Y	7	5-11	AN	4-46
3	Total Base Records	Y	5	12-16	P	4-46
4	Reserved		5	17-21	AN	4-46
5	Total of Status Code DF		5	22-26	P	4-46
6	Total Associated Consumer Segments (J1)	A	5	27-31	P	4-46
7	Total Associated Consumer Segments (J2)	A	5	32-36	P	4-46
8	Block Count	Y	5	37-41	P	4-46
9	Total of Status Code DA		5	42-46	P	4-46
10	Total of Status Code 05		5	47-51	P	4-46
11	Total of Status Code 11		5	52-56	P	4-46
12	Total of Status Code 13		5	57-61	P	4-47
13	Total of Status Code 61		5	62-66	P	4-47
14	Total of Status Code 62		5	67-71	P	4-47
15	Total of Status Code 63		5	72-76	P	4-47
16	Total of Status Code 64		5	77-81	P	4-47
17	Total of Status Code 65		5	82-86	P	4-47
18	Total of Status Code 71		5	87-91	P	4-47
19	Total of Status Code 78		5	92-96	P	4-47
20	Total of Status Code 80		5	97-101	P	4-47
21	Total of Status Code 82		5	102-106	P	4-47
22	Total of Status Code 83		5	107-111	P	4-47
23	Total of Status Code 84		5	112-116	P	4-47
24	Total of Status Code 88		5	117-121	P	4-47
25	Total of Status Code 89		5	122-126	P	4-48
26	Total of Status Code 93		5	127-131	P	4-48
27	Total of Status Code 94		5	132-136	P	4-48

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

² Recording Technique: AN = Alphanumeric; B = Binary; P = Packed

³ Refer to definitions for field descriptions.

Record Layouts

Trailer Record — Packed Format

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

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

² Recording Technique: AN = Alphanumeric; P = Packed

³ 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	426 Character Format ¹		
		Length	Position	Recording Technique
0	Block Descriptor Word (BDW) 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. *This field is not required when reporting fixed length, fixed block records.	4	1-4 of each block of data*	N
1	Record Descriptor Word (RDW) Contains a value equal to the length of the physical record. This value includes the four bytes reserved for this field. The recording technique is Numeric for the 426 format and Binary for the 366 format. <ul style="list-style-type: none"> Numeric: The entire four bytes are used. Example: F0F4F2F6. 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. 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.	4	1-4 of each physical record	N
2	Record Identifier Contains a constant of HEADER , which is used to identify this record.	6	5-10	AN

¹ For 366 Packed Format specifications, refer to the Record Layouts section of the Metro 2® Format module.

Field Definitions

Header Record

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

Field Definitions

Header Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
11	Program Revision Date Contains the last date your reporting format was revised. Format is MMDDYYYY. If the day is not available, use 01.	8	72-79	N
12	Reporter Name 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
13	Reporter Address Contains the complete mailing address of the processing company; i.e., street address, city, state and zip code.	96	120-215	AN
14	Reporter Telephone Number Contains the telephone number (Area Code + number) of the company sending the data; i.e., data furnisher or processor.	10	216-225	N
15	Software Vendor Name Contains the name of the software vendor that provided the Metro 2® Format software.	40	226-265	AN
16	Software Version Number Contains the version number of the Metro 2® Format software.	5	266-270	AN
17	MicroBilt/PRBC Program Identifier Contains a unique identification number assigned by this consumer reporting agency.	10	271-280	AN
18	Reserved Blank fill.	146	281-426	AN

Field Definitions

Base Segment

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	426 Character Format ¹		
		Length	Position	Recording Technique
0	Block Descriptor Word (BDW) 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. *This field is not required when reporting fixed length, fixed block records.	4	1-4 of each block of data*	N
1	Record Descriptor Word (RDW) 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. For example: Base Segment= 426 J2 Segment = 200 K1 Segment = 34 RDW = 0660 For fixed block, the RDW will remain the same for each record. For variable block, the RDW will change depending on the size of each record.	4	1-4 of each physical record	N
2	Processing Indicator Report a constant of 1 .	1	5	N

¹ For 366 Packed Format specifications, refer to the Record Layouts section of the Metro 2® Format module.

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
3	Time Stamp Contains date and time of actual account information update. Format for packed date is 0MMDDYYYYHHMMSSs — where s is the sign. Format is MMDDYYYYHHMMSS for character date.	14	6-19	N
4	Correction Indicator Used to replace the most recently reported update for the same reporting time period. Values available: 0 = Not a replacement update (normal update) 1 = Replacement update (correction) <ul style="list-style-type: none"> Only the records to be corrected should be reported on the media with this indicator set to 1. Do not mix normal updates (value 0) with replacement updates (value 1) on the same media. Must receive corrected media prior to the next reporting period. The Date of Account Information must be equal to the previously-reported Date of Account Information for matching purposes. If being reported for the first time, contact the Consumer Reporting Agencies. Example: If data is generated on 09/01/2015 for Date of Account Information 08/30/2015, 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 09/10/2015, the corrected record must be reported using the original Date of Account Information of 08/30/2015 and the corrected Special Comment. The Correction Indicator would be set to 1 .	1	20	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
5	<p>Identification Number</p> <p>Used to uniquely identify a data furnisher. Report your internal code to identify each branch, office, and/or credit central where information is verified. For accounts reported by servicers, the Identification Number should refer to the current holder of the note.</p> <p>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>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.</p>	20	21-40	AN
6	<p>Cycle Identifier</p> <p>Report the internal cycle code for this account. Field is required if reporting by cycles; otherwise blank fill.</p>	2	41-42	AN
7	<p>Consumer Account Number</p> <p>Report the individual's complete and unique account number as extracted from your file. Do not include embedded blanks or special characters.</p> <p>Do not report the Social Security Number, in whole or in part, within the Consumer Account Number.</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	43-72	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
8	Portfolio Type Contains the one-character abbreviation for type of portfolio. Values available: C = Line of Credit I = Installment M = Mortgage O = Open R = Revolving Refer to the Glossary of Terms for definitions of each Portfolio Type.	1	73	AN
9	Account Type Report the specific code that identifies the account classification. Exhibit 1 provides a numeric listing of type codes that specify industry usage, and Exhibit 2 provides an alphabetic listing of type codes within their corresponding Portfolio Types.	2	74-75	AN
10	Date Opened 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. Valid Dates Opened must be reported – field cannot be zero or blank filled, nor contain a date in the future. For companies who report returned checks, such as collection agencies, report the date of the check. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If the day is not available, use 01.	8	76-83	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
11	Credit Limit Report the following values in whole dollars only: Line of Credit = Assigned credit limit* Installment = Zero fill Mortgage = Zero fill Open = Assigned credit limit*, if applicable; otherwise, zero fill Revolving = Assigned credit limit* * For closed accounts, continue to report the last assigned credit limit.	9	84-92	N
12	Highest Credit or Original Loan Amount Report the following values in whole dollars only: Line of Credit = Highest amount of credit utilized by the consumer Installment = Original amount of the loan excluding interest payments Mortgage = Original amount of the loan excluding interest payments Open = Highest amount of credit utilized by the consumer, if applicable Revolving = Highest amount of credit utilized by the consumer For companies who report returned checks, such as collection agencies, report the original amount of the check, excluding fees and interest.	9	93-101	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
13	Terms Duration Contains the duration of credit extended. Line of Credit = Constant of LOC Installment = Number of months Mortgage = Number of years Open = Constant of 001 <i>One payment as scheduled</i> Revolving = Constant of REV Exhibit 3 provides the calculations necessary to convert Terms Duration to monthly.	3	102-104	AN
14	Terms Frequency Report the frequency for payments due. Values available: D = Deferred (Refer to Note) P = Single Payment Loan W = Weekly B = Biweekly E = Semimonthly M = Monthly L = Bimonthly Q = Quarterly T = Tri-annually S = Semiannually Y = Annually Exhibit 3 provides definitions of the Terms Frequency Codes. Note: When reporting Deferred loans, report the Deferred Payment Start Date in the K4 Segment.	1	105	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
15	<p>Scheduled Monthly Payment Amount</p> <p>Report the dollar amount of the scheduled monthly payment due for this reporting period, whether principal, interest only or a combination of the two. Report in whole dollars only. When the account is paid in full, the Scheduled Monthly Payment Amount should be zero filled.</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 due this month</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>	9	106-114	N
16	<p>Actual Payment Amount</p> <p>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>	9	115-123	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
17A	<p>Account Status</p> <p>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	124-125	AN
17B	<p>Payment Rating</p> <p>When the Account Status (Field 17A) contains 05, 13, 65, 88, 89, 94 or 95, this field must also be reported. The Payment Rating must be blank filled for all other Account Status Codes.</p> <p>The Payment Rating contains a code that properly identifies whether the account was current, past due, in collections or charged off prior to the status and within the activity period being reported.</p> <p>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 September 22, 2015, but the consumer was 30 days past the due date on September 10, 2015 prior to paying the account, report Account Status Code = 13 and Payment Rating = 1.</p>	1	126	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
18	<p>Payment History Profile</p> <p>Contains up to 24 months of consecutive payment activity for the previous 24 reporting periods prior to the Date of Account Information (Field 24) being reported. Report one month's payment history in each byte from the left to right in most recent to least recent order. The first byte should represent the Account Status Code reported in the previous reporting period. Refer to Exhibit 5 for examples of reporting payment history, which includes examples for month-end reporters, as well as examples for reporters who submit data on other days of the month (e.g., 1st, 15th, etc.). 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 – either because the account was not open or because the payment history cannot be furnished. 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 Completed J = Voluntary Surrender K = Repossession L = Charge-off</p> <p>No other values are acceptable in this field.</p> <p>If a full 24 months of history are not available for reporting, the ending positions of this field should be B-filled.</p> <p>The Payment History Profile is intended to be used to report monthly 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>For important information:</p> <ul style="list-style-type: none"> • Paid accounts - refer to Frequently Asked Question 41. • First-time reporters - refer to Frequently Asked Question 22. 	24	127-150	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
19	<p>Special Comment</p> <p>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 each month as long as the condition applies.</p> <p>If more than one Special Comment applies to an account, it is the data furnisher's decision to report the comment that is deemed most important from a business perspective for the current reporting period.</p> <p>If no Special Comment is applicable, blank fill.</p> <p>Exhibit 6 provides a list of available comments by category within Portfolio Type and Exhibit 7 provides a list of codes in alphabetical sequence. Both exhibits include definitions and usage guidelines.</p> <p>For examples of how Account Statuses, Payment Ratings and Special Comments interact, refer to Frequently Asked Question 12.</p>	2	151-152	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
20	<p>Compliance Condition Code</p> <p>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 remain on file until another Compliance Condition Code or the XR (Removal value) is reported. As an option, the code may be reported each month as long as the condition applies. Regardless of the method of reporting, the code will be deleted only when another Compliance Condition Code or the XR (Removal value) is reported.</p> <p>Exhibit 8 provides a list of Compliance Condition Codes and examples that demonstrate how to report these codes.</p> <p>For questions about the use of Compliance Condition Codes or how long to report them, data furnishers should consult with their internal Legal counsel or Compliance area.</p> <p>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.</p>	2	153-154	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
21	<p>Current Balance</p> <p>Report the total current balance owed on the account as of the Date of Account Information.</p> <p>The Current Balance should contain the principal balance including Balloon Payment Amounts (when applicable), as well as applicable interest, late charges, fees, insurance payments and escrow that are due during the current reporting period. The Current Balance should not include <u>future</u> interest, escrow, fees or insurance payments.</p> <p>This amount, which should be reported in whole dollars only, may increase or decline from month to month. Credit balances (negative balances) should be reported as zero.</p>	9	155-163	N
22	<p>Amount Past Due</p> <p>Report the total amount of payments that are 30 days or more past due in whole dollars only. This field should include late charges and fees, if applicable. Do not include current amount due in this field.</p> <p>Note: If the Account Status is current (Status Code 11), this field should be zero.</p>	9	164-172	N
23	<p>Original Charge-off Amount</p> <p>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>	9	173-181	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
24	<p>Date of Account Information</p> <p>All account information in the Base Segment, such as Account Status and Current Balance, must be reported as of the date in this field.</p> <p>For Account Status Codes 11, 71, 78, 80, 82-84, 88, 89, 93-97, DA and DF, report a date within the current month's reporting period, as noted below:</p> <ul style="list-style-type: none"> • Cycle Reporters – Report the date of the current month's billing cycle. <i>This method is preferred to facilitate accurate and timely reporting of account information.</i> • Monthly Reporters – Report the date within the current month's reporting period that represents the most recent update to accounts, such as mid-month (08/15/2015) or end of month (08/31/2015). <p>For Account Status Code 05, report the date transferred. For Account Status Codes 13 and 61-65, report the date paid, unless the account was closed due to inactivity; then report the date within the current reporting period when the account was closed to further charges.</p> <p>For accounts reported with bankruptcy Consumer Information Indicators, refer to Frequently Asked Questions 27 and 28 for guidelines on reporting the Date of Account Information.</p> <p>Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs – where s is the sign.</p> <p>Notes: This date must not reflect a future date.</p> <p>For guidelines on reporting paid, closed or inactive accounts, refer to FAQs 39, 40 and 41.</p>	8	182-189	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
25	<p>FCRA Compliance/Date of First Delinquency</p> <p>This date is used to ensure compliance with the Fair Credit Reporting Act.</p> <p>The date in the Date of First Delinquency field must be determined each reporting period based on the following hierarchy:</p> <ol style="list-style-type: none"> 1. 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. 2. 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. 3. 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 petition or notification. Even though the account is not delinquent, this date is required for purging purposes. <p>Note that Consumer Information Indicators W, X & Y are obsolete as of September 2010 and may no longer be reported.</p> <p>If none of the conditions listed in the above hierarchy apply, the Date of First Delinquency should be zero filled.</p> <p>Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign.</p> <p>Notes:</p> <ul style="list-style-type: none"> • Refer to Exhibit 9 for detailed reporting instructions, examples and excerpts from the Fair Credit Reporting Act. • First-time reporters should refer to Frequently Asked Question 22 for important information. 	8	190-197	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
26	Date Closed For all portfolio types, contains the date the account was closed to further purchases, paid in full or sold. For Line of Credit, Open or Revolving accounts, there may be a balance due. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If not applicable, zero fill.	8	198-205	N
27	Date of Last Payment Report the date of the most recent consumer payment, whether full or partial payment is made. Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign. If the day is not available, use 01.	8	206-213	N
28	Interest Type Indicator Contains one of the following values that designates the interest type: F = Fixed V = Variable/Adjustable If indicator not available or unknown, blank fill. Note: Report indicator 'V' for loans where the interest rate will be variable at some point, even if the interest rate starts as fixed.	1	214	AN
28A	Reserved Blank fill.	16	215-230	AN
29	Consumer Transaction Type 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	231	AN

Field Definitions

Base Segment

Note: Fields 30 through 46 contain identification information for the primary consumer. For joint accounts where two or more consumers are contractually responsible, the consumer reported in this Base Segment will be considered primary for reporting purposes.

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
30	<p>Surname 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 surnames. For example, "Smith-Jones" requires the hyphen.</p> <p>If the surname contains separate words, the hyphen is not required. For example, report "Van Dyke" or "de la Cruz" with a space between each word.</p> <p>If reporting Hispanic names, hyphenate the two surnames: Paternal Name-Maternal Name.</p> <p>Other than the hyphen, do not report special characters in any of the Consumer Name fields.</p> <p>The Generation Code should be reported in Field 33.</p> <p>Notes: Do not report minors. The name fields should not contain messages, such as "Parent of", "Baby", "Daughter", "Child", etc.</p> <p>Do not report trustee or estate accounts.</p>	25	232-256	AN
31	<p>First Name Report the first name of the primary consumer.</p> <p>If reporting multiple first names, hyphenate the first names.</p> <p>Note: If a consumer uses only initials for first and middle names (e.g., A.J.), the first name initial should be reported in the First Name field (e.g., A) and the middle initial should be reported in the Middle Name field (e.g., J).</p>	20	257-276	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
32	Middle Name Report the middle name or middle initial of the primary consumer, if available. If reporting multiple middle names, hyphenate the middle names.	20	277-296	AN
33	Generation Code Used to distinguish Jr., Sr., II, III, 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	1	297	AN
34	Social Security Number Report the Social Security Number (SSN) of the primary consumer. Report only valid U.S.-issued SSNs. Reporting of this information is highly recommended as the Social Security Number greatly enhances accuracy in matching to the correct consumer. If the consumer does not have an SSN or one is not available for reporting, zero- or 9-fill all positions. Notes: 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. Do not report Credit Profile Numbers (CPNs) in this field. The CPN should not be used for credit reporting purposes and does not replace the Social Security Number.	9	298-306	N

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
35	<p>Date of Birth Report the date of birth of the primary consumer.</p> <p>Reporting of this information is highly recommended as the date of birth greatly enhances accuracy in matching to the correct consumer.</p> <p>It is important to report the full Date of Birth, including the month, day and year. If the month and day are not available, use 0101. The four-digit year is required. If not available, zero fill the entire field.</p> <p>Format for character date is MMDDYYYY. Format for packed date is 0MMDDYYYYs — where s is the sign.</p> <p>Note: Do not report accounts of consumers who are too young to enter into a binding contract.</p>	8	307-314	N
36	<p>Telephone Number Contains the telephone number of the primary consumer (Area Code + 7 digits).</p>	10	315-324	N
37	<p>ECOA Code 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.</p> <p>Exhibit 10 provides a list of ECOA Codes, their definitions and usage.</p> <p>For important information:</p> <ul style="list-style-type: none"> Guidelines on reporting consumers who are personally liable for business accounts – refer to Frequently Asked Question 20. Usage guidelines on ECOA Codes T (Terminated) and Z (Delete Consumer) – refer to Frequently Asked Question 14(b). <p>Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.</p>	1	325	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
38	<p>Consumer Information Indicator</p> <p>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 remain on file until another Consumer Information Indicator or a Removal value is reported. As an option, the indicator may be reported each month as long as the condition applies.</p> <p>Regardless of the method of reporting, the indicator will be deleted <i>only</i> when another Consumer Information Indicator or a Removal value (Q, S, U) is reported.</p> <p>Exhibit 11 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines, refer to Frequently Asked Questions 23 through 32 (bankruptcy) and 61 (personal receivership).</p> <p>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.</p>	2	326-327	AN
39	<p>Country Code</p> <p>Contains the standard two-character country abbreviation.</p> <p>Exhibit 12 provides a list of the Country Codes.</p>	2	328-329	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
40	<p>First Line of Address</p> <p>Contains billing/mailling address for the primary consumer. If the consumer has a U.S. address and a foreign address, report the U.S. address.</p> <p>The First Line of Address usually includes street number, direction, street name, and type of thoroughfare.</p> <p>If the billing/mailling 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 billing/mailling 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", "Care of", "M/R" (Mail Returned), etc.</p> <p>Exhibit 13 provides general rules for address reporting. Do not enter data furnisher's address in this field.</p>	32	330-361	AN
41	<p>Second Line of Address</p> <p>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", "Care of", "M/R" (Mail Returned), etc.</p>	32	362-393	AN
42	<p>City</p> <p>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	394-413	AN

Field Definitions

Base Segment

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
43	State Contains the standard U.S. Postal Service state abbreviation for the address of the primary consumer. Exhibit 14 provides a list of State Codes.	2	414-415	AN
44	Postal/Zip Code 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.	9	416-424	AN
45	Address Indicator Contains one of the following values for the address reported in fields 40-44: C = Confirmed/Verified address Note: Value 'C' enables reporting a confirmed or verified address after receiving an address discrepancy notification from a consumer reporting agency. Report 'C' one time after the address is confirmed. Y = Known to be address of primary consumer N = Not confirmed address M = Military address S = Secondary Address B = Business address — not consumer's residence U = Non-deliverable address/Returned mail D = Data reporter's default address P = Bill Payer Service — not consumer's residence If indicator not available or unknown, blank fill.	1	425	AN
46	Residence Code Contains the one-character residence code of the address reported in fields 40-44. Values available: O = Owns R = Rents If not available or unknown, blank fill.	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	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of J1 .	2	1-2	AN
2	Consumer Transaction Type 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

Field Definitions

J1 Segment Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
3	<p>Surname Report the last name of the associated consumer. Titles and prefixes should not be reported.</p> <p>If the surname contains multiple last names, hyphenate the surnames. For example, "Smith-Jones" requires the hyphen.</p> <p>If the surname contains separate words, the hyphen is not required. For example, report "Van Dyke" or "de la Cruz" with a space between each word.</p> <p>If reporting Hispanic names, hyphenate the two surnames: Paternal Name–Maternal Name.</p> <p>Other than the hyphen, do not report special characters in any of the Consumer Name fields.</p> <p>The Generation Code should be reported in Field 6.</p> <p>Notes: Do not report minors. The name fields should not contain messages, such as "Parent of", "Baby", "Daughter", "Child", etc.</p> <p>Do not report trustee or estate accounts.</p>	25	4-28	AN
4	<p>First Name Report the first name of the associated consumer.</p> <p>If reporting multiple first names, hyphenate the first names.</p> <p>Note: If a consumer uses only initials for first and middle names (e.g., A.J.), the first name initial should be reported in the First Name field (e.g., A) and the middle initial should be reported in the Middle Name field (e.g., J).</p>	20	29-48	AN
5	<p>Middle Name Report the middle name or middle initial of the associated consumer, if available.</p> <p>If reporting multiple middle names, hyphenate the middle names.</p>	20	49-68	AN

Field Definitions

J1 Segment Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
6	Generation Code 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	1	69	AN
7	Social Security Number Report the Social Security Number (SSN) of the associated consumer. Report only valid U.S.-issued SSNs. Reporting of this information is highly recommended as the Social Security Number greatly enhances accuracy in matching to the correct consumer. If the consumer does not have an SSN or one is not available for reporting, zero- or 9-fill all positions. Notes: 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. Do not report Credit Profile Numbers (CPNs) in this field. The CPN should not be used for credit reporting purposes and does not replace the Social Security Number.	9	70-78	N

Field Definitions

J1 Segment Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
8	<p>Date of Birth Report 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.</p> <p>It is important to report the full Date of Birth, including the month, day and year. If the month and day are not available, use 0101. The four-digit year is required. If not available, zero fill the entire field.</p> <p>Format is MMDDYYYY.</p> <p>Note: Do not report accounts of consumers who are too young to enter into a binding contract.</p>	8	79-86	N
9	<p>Telephone Number Contains the telephone number of the associated consumer (Area Code + 7 digits).</p>	10	87-96	N
10	<p>ECOA Code 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.</p> <p>Exhibit 10 provides a list of ECOA Codes, their definitions and usage.</p> <p>For important information:</p> <ul style="list-style-type: none"> Guidelines on reporting consumers who are personally liable for business accounts – refer to Frequently Asked Question 20. Usage guidelines on ECOA Codes T (Terminated) and Z (Delete Consumer) – refer to Frequently Asked Question 14(b). <p>Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.</p>	1	97	AN

Field Definitions

J1 Segment Associated Consumer—Same Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
11	<p>Consumer Information Indicator 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 remain on file until another Consumer Information Indicator or a Removal value is reported. As an option, the indicator may be reported each month as long as the condition applies. Regardless of the method of reporting, the indicator will be deleted <i>only</i> when another Consumer Information Indicator or a Removal value (Q, S, U) is reported.</p> <p>Exhibit 11 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines, refer to Frequently Asked Questions 23 through 32 (bankruptcy) and 61 (personal receivership).</p> <p>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.</p>	2	98-99	AN
12	<p>Reserved Blank fill.</p>	1	100	AN

Note: For additional reporting guidelines specific to the J1 Segment, refer to Frequently Asked Questions 6, 7 and 17 through 19.

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	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of J2 .	2	1-2	AN
2	Consumer Transaction Type 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

Field Definitions

J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
3	<p>Surname Report the last name of the associated consumer. Titles and prefixes should not be reported.</p> <p>If the surname contains multiple last names, hyphenate the surnames. For example, "Smith-Jones" requires the hyphen.</p> <p>If the surname contains separate words, the hyphen is not required. For example, report "Van Dyke" or "de la Cruz" with a space between each word.</p> <p>If reporting Hispanic names, hyphenate the two surnames: Paternal Name–Maternal Name.</p> <p>Other than the hyphen, do not report special characters in any of the Consumer Name fields.</p> <p>The Generation Code should be reported in Field 6.</p> <p>Notes: Do not report minors. The name fields should not contain messages, such as "Parent of", "Baby", "Daughter", "Child", etc.</p> <p>Do not report trustee or estate accounts.</p>	25	4-28	AN
4	<p>First Name Report the first name of the associated consumer.</p> <p>If reporting multiple first names, hyphenate the first names.</p> <p>Note: If a consumer uses only initials for first and middle names (e.g., A.J.), the first name initial should be reported in the First Name field (e.g., A) and the middle initial should be reported in the Middle Name field (e.g., J).</p>	20	29-48	AN
5	<p>Middle Name Report the middle name or middle initial of the associated consumer, if available.</p> <p>If reporting multiple middle names, hyphenate the middle names.</p>	20	49-68	AN

Field Definitions

J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
6	Generation Code 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	1	69	AN
7	Social Security Number Report the Social Security Number (SSN) of the associated consumer. Report only valid U.S.-issued SSNs. Reporting of this information is highly recommended as the Social Security Number greatly enhances the accuracy in matching to the correct consumer. If the consumer does not have an SSN or if one is not available for reporting, zero- or 9-fill all positions. 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. Do not report Credit Profile Numbers (CPNs) in this field. The CPN should not be used for credit reporting purposes and does not replace the Social Security Number.	9	70-78	N

Field Definitions

J2 Segment

Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
8	<p>Date of Birth Report 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.</p> <p>It is important to report the full Date of Birth, including the month, day and year. If the month and day are not available, use 0101. The four-digit year is required. If not available, zero fill the entire field.</p> <p>Format is MMDDYYYY.</p> <p>Note: Do not report accounts of consumers who are too young to enter into a binding contract.</p>	8	79-86	N
9	<p>Telephone Number Contains the telephone number of the associated consumer (Area Code + 7 digits).</p>	10	87-96	N
10	<p>ECOA Code 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.</p> <p>Exhibit 10 provides a list of ECOA Codes, their definitions and usage.</p> <p>For important information:</p> <ul style="list-style-type: none"> Guidelines on reporting consumers who are personally liable for business accounts – refer to Frequently Asked Question 20. Usage guidelines on ECOA Codes T (Terminated) and Z (Delete Consumer) – refer to Frequently Asked Question 14(b). <p>Note: Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.</p>	1	97	AN

Field Definitions

J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
11	<p>Consumer Information Indicator 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 remain on file until another Consumer Information Indicator or a Removal value is reported. As an option, the indicator may be reported each month as long as the condition applies.</p> <p>Regardless of the method of reporting, the indicator will be deleted <i>only</i> when another Consumer Information Indicator or a Removal value (Q, S, U) is reported.</p> <p>Exhibit 11 provides a list of Consumer Information Indicators and examples that demonstrate how to report these codes.</p> <p>For reporting guidelines, refer to Frequently Asked questions 23 through 32 (bankruptcy) and 61 (personal receivership).</p> <p>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.</p>	2	98-99	AN
12	<p>Country Code Contains the standard two-character country abbreviation.</p> <p>Exhibit 12 provides a list of the Country Codes.</p>	2	100-101	AN

Field Definitions

J2 Segment Associated Consumer—Different Address

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
13	<p>First Line of Address Contains billing/mailling address for associated consumer. If the consumer has a U.S. address and a foreign address, report the U.S. address.</p> <p>The First Line of Address usually includes street number, direction, street name, and type of thoroughfare.</p> <p>If the billing/mailling 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 billing/mailling 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", "Care of", "M/R" (Mail Returned), etc.</p> <p>Exhibit 13 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>Second Line of Address 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", "Care of", "M/R" (Mail Returned), etc.</p>	32	134-165	AN
15	<p>City 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	426 and 366 FORMATS		
		Length	Position	Recording Technique
16	State Contains the standard U.S. Postal Service state abbreviation for the address of the associated consumer. Exhibit 14 provides a list of State Codes.	2	186-187	AN
17	Postal/Zip Code 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.	9	188-196	AN
18	Address Indicator Contains one of the following values for the address reported in fields 13-17: C = Confirmed/Verified address Note: Value 'C' enables reporting a confirmed or verified address after receiving an address discrepancy notification from a consumer reporting agency. Report 'C' one time after the address is confirmed. Y = Known to be address of associated consumer N = Not confirmed address M = Military address S = Secondary address B = Business address — not consumer's residence U = Non-deliverable address/Returned mail D = Data reporter's default address P = Bill Payer Service — not consumer's residence If indicator not available or unknown, blank fill.	1	197	AN
19	Residence Code Contains the one-character residence code of the address reported in fields 13-17. Values available: O = Owns R = Rents If not available or unknown, blank fill.	1	198	AN
20	Reserved Blank fill.	2	199-200	AN

Note: For additional reporting guidelines specific to the J2 Segment, refer to Frequently Asked Questions 6, 7 and 17 through 20.

Field Definitions

K1 Segment Original Creditor Name

The K1 Segment must be present each time the account is reported by collection agencies, debt buyers, check guarantee companies, student loan guaranty agencies, the U.S. Department of Education, and the U.S. Treasury. **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	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of K1 .	2	1-2	AN
2	Original Creditor Name The content of this field is dependent on the type of reporter. Collection Agencies: Report the name of the company/creditor that originally opened the account for the consumer, even if the account had been turned over to multiple collection agencies. Debt Buyers: Report the name of the company/creditor that originally opened the account for the consumer, even if the account had been sold multiple times to different debt buyers. Refer to the K2 Segment for "purchased from" information. Companies Reporting Returned Checks: Report the name of the payee; i.e., name of company to which the check was written. Refer to Frequently Asked Question 15 for additional guidelines on reporting returned checks. Student Loan Guarantors/U.S. Department of Education: Report the name of the original student loan lender. One of the following three options should be used when reporting a creditor's name that would reveal sensitive information about the consumer. 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. 2. Use the corporate name if it is different from the commercial name of a mental institution or drug rehabilitation center. 3. Do not report the account if either of the above two options would not sufficiently protect the consumer's privacy. Note: Encoded information is not acceptable in this field.	30	3-32	AN

(continued)

Field Definitions

K1 Segment Original Creditor Name

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
3	Creditor Classification Contains a code indicating a general type of business for the Original Creditor Name. Values available: 01 = Retail 02 = Medical/Health Care <i>Required when reporting medical debts and returned checks from providers of medical services, products or devices</i> 03 = Oil Company 04 = Government 05 = Personal Services 06 = Insurance 07 = Educational 08 = Banking 09 = Rental/Leasing 10 = Utilities 11 = Cable/Cellular 12 = Financial 13 = Credit Union 14 = Automotive 15 = Check Guarantee	2	33-34	N

Note: 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' to indicate 'Medical/Health Care'. The actual name of the original creditor should continue to be reported in the Original Creditor Name (Field 2).

Field Definitions

K2 Segment Purchased From/Sold To

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

Notes: For reporting guidelines for accounts sold to another company or accounts purchased from another company, refer to Frequently Asked Questions 47 & 48.

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

The K2 Segment may be reported by debt buyers when the name of the company from which the account was purchased is different from the original creditor's name, which is reported in the K1 Segment. If the original creditor and the company from which the account was purchased are the same, the K2 Segment should not be reported.

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	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of K3 .	2	1-2	AN
2	Agency Identifier 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	Account Number Contains the account number as assigned by the secondary marketing agency. Do not include embedded blanks or special characters. If field 2 = 00, this field should be blank filled.	18	5-22	AN
4	Mortgage Identification Number (MIN) Contains the Mortgage Identification Number assigned to a mortgage loan. Do not include embedded blanks or special characters. 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 http://www.mersinc.org .	18	23-40	AN

Field Definitions

K4 Segment Specialized Payment Information

The K4 Segment may be used to report information on specialized payment schedules for any type of loan for either deferred payments or balloon payments, which may include principal forbearance. 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.

If an account has multiple balloon payments, only one can be reported at a time. When one balloon payment has been paid, the next one due can be reported.

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	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of K4 .	2	1-2	AN
2	Specialized Payment Indicator Contains a code describing the specialized payment arrangements. Values available: 01 = Balloon Payment 02 = Deferred Payment	2	3-4	N
3	Deferred Payment Start Date 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 44 for guidelines on reporting deferred loans.	8	5-12	N
4	Balloon Payment Due Date 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	Balloon Payment Amount Report the amount of the balloon payment in whole dollars only.	9	21-29	N
6	Reserved 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	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of L1 .	2	1-2	AN
2	Change Indicator 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	New Consumer Account Number Contains the new Account Number assigned to this account. Do not include embedded blanks or special characters. If field 2 = 2, this field should be blank filled.	30	4-33	AN

(continued)

Field Definitions

L1 Segment

Account Number/Identification Number Change

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

Notes: For additional reporting guidelines specific to the L1 Segment, refer to Frequently Asked Question and Answer 5.

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	426 and 366 FORMATS		
		Length	Position	Recording Technique
1	Segment Identifier Contains a constant of N1 .	2	1-2	AN
2	Employer Name Report the name of the employer for the consumer reported in the Base Segment.	30	3-32	AN
3	First Line of Employer Address 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	Second Line of Employer Address Contains second line of employer's address, if needed.	32	65-96	AN
5	Employer City 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	Employer State Contains the standard U.S. Postal Service state abbreviation for the address of the employer. Exhibit 14 provides a list of State Codes.	2	117-118	AN
7	Employer Postal/Zip Code 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

(continued)

Field Definitions

N1 Segment Employment

FIELD	FIELD NAME & DESCRIPTION	426 and 366 FORMATS		
		Length	Position	Recording Technique
8	Occupation Report title or position for consumer reported in the Base Segment (the employee).	18	128-145	AN
9	Reserved 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	426 Character Format ¹		
		Length	Position	Recording Technique
1	Record Descriptor Word (RDW) 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	N
2	Record Identifier Contains a constant of TRAILER which is used to identify this record.	7	5-11	AN
3	Total Base Records Contains the total number of Base Segments being reported.	9	12-20	N
4	Reserved Blank fill.	9	21-29	AN
5	Total of Status Code DF Contains the total number of Base Segments with Status Code DF in Field 17A.	9	30-38	N
6	Total Associated Consumer Segments (J1) Contains the total number of J1 Segments being reported. Do not count blank- or 9-filled segments.	9	39-47	N
7	Total Associated Consumer Segments (J2) Contains the total number of J2 Segments being reported. Do not count blank- or 9-filled segments.	9	48-56	N
8	Block Count Contains the number of blocks on the file, if applicable.	9	57-65	N
9	Total of Status Code DA Contains the total number of Base Segments with Status Code DA in Field 17A.	9	66-74	N
10	Total of Status Code 05 Contains the total number of Base Segments with Status Code 05 in Field 17A.	9	75-83	N
11	Total of Status Code 11 Contains the total number of Base Segments with Status Code 11 in Field 17A.	9	84-92	N

¹ For 366 Packed Format specifications, refer to the Record Layouts section of the Metro 2[®] Format module.

Field Definitions

Trailer Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
12	Total of Status Code 13 Contains the total number of Base Segments with Status Code 13 in Field 17A.	9	93-101	N
13	Total of Status Code 61 Contains the total number of Base Segments with Status Code 61 in Field 17A.	9	102-110	N
14	Total of Status Code 62 Contains the total number of Base Segments with Status Code 62 in Field 17A.	9	111-119	N
15	Total of Status Code 63 Contains the total number of Base Segments with Status Code 63 in Field 17A.	9	120-128	N
16	Total of Status Code 64 Contains the total number of Base Segments with Status Code 64 in Field 17A.	9	129-137	N
17	Total of Status Code 65 Contains the total number of Base Segments with Status Code 65 in Field 17A.	9	138-146	N
18	Total of Status Code 71 Contains the total number of Base Segments with Status Code 71 in Field 17A.	9	147-155	N
19	Total of Status Code 78 Contains the total number of Base Segments with Status Code 78 in Field 17A.	9	156-164	N
20	Total of Status Code 80 Contains the total number of Base Segments with Status Code 80 in Field 17A.	9	165-173	N
21	Total of Status Code 82 Contains the total number of Base Segments with Status Code 82 in Field 17A.	9	174-182	N
22	Total of Status Code 83 Contains the total number of Base Segments with Status Code 83 in Field 17A.	9	183-191	N
23	Total of Status Code 84 Contains the total number of Base Segments with Status Code 84 in Field 17A.	9	192-200	N
24	Total of Status Code 88 Contains the total number of Base Segments with Status Code 88 in Field 17A.	9	201-209	N

Field Definitions

Trailer Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
25	Total of Status Code 89 Contains the total number of Base Segments with Status Code 89 in Field 17A.	9	210-218	N
26	Total of Status Code 93 Contains the total number of Base Segments with Status Code 93 in Field 17A.	9	219-227	N
27	Total of Status Code 94 Contains the total number of Base Segments with Status Code 94 in Field 17A.	9	228-236	N
28	Total of Status Code 95 Contains the total number of Base Segments with Status Code 95 in Field 17A.	9	237-245	N
29	Total of Status Code 96 Contains the total number of Base Segments with Status Code 96 in Field 17A.	9	246-254	N
30	Total of Status Code 97 Contains the total number of Base Segments with Status Code 97 in Field 17A.	9	255-263	N
31	Total of ECOA Code Z (All Segments) 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).	9	264-272	N
32	Total Employment Segments Contains the total number of records with employment being reported in the N1 Segment.	9	273-281	N
33	Total Original Creditor Segments Contains the total number of records with Original Creditors being reported in the K1 Segment.	9	282-290	N
34	Total Purchased From/Sold To Segments Contains the total number of records with Purchased From/Sold To being reported in the K2 Segment.	9	291-299	N
35	Total Mortgage Information Segments Contains the total number of records with Mortgage Information being reported in the K3 Segment.	9	300-308	N
36	Total Specialized Payment Information Segments Contains the total number of records with Specialized Payment Information being reported in the K4 Segment.	9	309-317	N
37	Total Change Segments Contains the total number of Consumer Account Number and/or Identification Number changes being reported in the L1 Segment.	9	318-326	N

Field Definitions

Trailer Record

FIELD	FIELD NAME & DESCRIPTION	426 Character Format		
		Length	Position	Recording Technique
38	Total Social Security Numbers (All Segments) 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.	9	327-335	N
39	Total Social Security Numbers (Base Segments) Contains the total number of valid Social Security Numbers reported in the Base Segment (Field 34). Do not count zero- or 9-filled SSNs.	9	336-344	N
40	Total Social Security Numbers (J1 Segments) Contains the total number of valid Social Security Numbers reported in the J1 Segment (Field 7). Do not count zero- or 9-filled SSNs.	9	345-353	N
41	Total Social Security Numbers (J2 Segments) Contains the total number of valid Social Security Numbers reported in the J2 Segment (Field 7). Do not count zero- or 9-filled SSNs.	9	354-362	N
42	Total Dates of Birth (All Segments) 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.	9	363-371	N
43	Total Dates of Birth (Base Segments) Contains the total number of valid Dates of Birth reported in the Base Segment (Field 35). Do not count zero-filled Dates of Birth.	9	372-380	N
44	Total Dates of Birth (J1 Segments) Contains the total number of valid Dates of Birth reported in the J1 Segment (Field 8). Do not count zero-filled Dates of Birth.	9	381-389	N
45	Total Dates of Birth (J2 Segments) Contains the total number of valid Dates of Birth reported in the J2 Segment (Field 8). Do not count zero-filled Dates of Birth.	9	390-398	N
46	Total Telephone Numbers (All Segments) 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.	9	399-407	N
47	Reserved Blank fill.	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	Bank/ Sygs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
00	Auto	X			X			X			X		
01	Unsecured	X			X			X			X		
02	Secured ¹	X			X			X			X		
03	Partially Secured	X			X			X			X		
04	Home Improvement	X			X			X	X				
05	FHA Home Improvement	X			X			X	X				
06	Installment Sales Contract ¹									X	X		X
07	Charge Account ¹									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				X				
10	Business Loan	X			X			X					
11	Recreational Merchandise	X			X			X			X		

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
12	Education	X			X		X					X	
13	Lease ¹	X			X			X			X		
15	Line of Credit ¹	X			X			X				X	
17	Manufactured Housing	X			X			X	X		X		
18	Credit Card	X		X	X			X					
19	FHA Real Estate Mortgage (Terms Duration in years)	X			X				X				
20	Note Loan	X			X			X					
25	VA Real Estate Mortgage (Terms Duration in years)	X			X				X				
26	Conventional Real Estate Mortgage — including Purchase Money First ¹ (Terms Duration in years)	X			X				X				
29	Rental Agreement Note: Used by rental companies												

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
37	Combined Credit Plan ¹	X		X	X								
43	Debit Card ¹	X			X			X					
47	Credit Line Secured	X			X			X					
48	Collection Agency/Attorney					X							
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						

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
73	Government Employee Advance						X						
74	Government Misc. Debt						X						
75	Government Benefit						X						
77	Returned Check ¹					X							
89	Home Equity Line of Credit	X			X				X				
90	Medical Debt	X			X			X					
91	Debt Consolidation ¹	X			X			X					
92	Utility Company												X
93	Child Support		X										
95	Attorney Fees ¹	X			X								
0A	Time Share Loan ¹	X			X			X	X				
2A	Secured Credit Card ¹	X		X	X								
3A	Auto Lease ¹	X			X			X			X		
5A	Real Estate — Junior Liens and Non-Purchase Money First ¹ (Terms Duration in years)	X			X				X				

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
6A	Commercial Installment Loan ¹	X			X			X					
7A	Commercial Line of Credit ¹	X			X			X					
8A	Business Credit Card ¹	X		X	X								
9A	Secured Home Improvement	X			X			X	X				
5B	Second Mortgage (Terms Duration in years)	X			X				X				
6B	Commercial Mortgage Loan ¹ (Terms Duration in years)	X			X				X				
7B	Agricultural	X			X			X			X		
8B	Deposit Account with Overdraft Protection ¹	X			X								
9B	Business Line Personally Guaranteed	X			X			X					
0C	Debt Buyer					X							

(continued)

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 1

Account Type Codes by Industry

Code	Description	Bank/ Svgs & Loan	Child Support Agency	Credit Card Issuer	Credit Union	Debt Buyer/ Coll. Agency	Govt. Agency	Loan Finance	Mtg. Lender	Retail Store	Sales Finance	Student Loan Lender	Utility
2C	U.S. Department of Agriculture (USDA) Real Estate Mortgage Loan (Terms Duration in years)	X			X				X				
4D	Telecommunications/Cellular												X
6D	Home Equity ¹	X			X				X				
0F	Construction Loan	X			X			X	X				
0G	Flexible Spending Credit Card ¹	X		X	X								

Note: Account Type Codes 22 (Secured by Household Goods), 23 (Secured by Household Goods & Other Collateral) and 1C (Household Goods) are obsolete as of September 2011 and may no longer be reported.

¹ Refer to Exhibit 2 for definitions and/or reporting guidelines.

Exhibit 2

Account Type Codes within Portfolio Type

The following table contains an alphabetic listing of the Account Type Codes and their corresponding Portfolio Types.

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
7B	Agricultural		X			
95	Attorney Fees <i>To be used to report an unsecured loan for the purpose of paying attorney fees.</i>		X			
00	Auto		X			
3A	Auto Lease <i>Refer to Frequently Asked Question 36 for guidelines specific to terminated leases and Frequently Asked Question 37 for guidelines specific to prepaid auto leases.</i>		X			
8A	Business Credit Card <i>Individual is personally liable.</i>				X	X
9B	Business Line Personally Guaranteed	X				
10	Business Loan		X			
07	Charge Account <i>Used by the Retail Store industry.</i>					X
93	Child Support				X	
48	Collection Agency/Attorney				X	
37	Combined Credit Plan <i>Represents two credit plans being reported as one account. Example: Visa and MasterCard on one bill.</i>				X	X
6A	Commercial Installment Loan <i>Individual is personally liable; company is guarantor.</i>		X			

(continued)

CREDIT REPORTING RESOURCE GUIDE®

Copyright 2015 © Consumer Data Industry Association

5-7

EXP/RFlorence 001177

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
7A	Commercial Line of Credit <i>Individual is personally liable; company is guarantor.</i>	X				
6B	Commercial Mortgage Loan <i>Terms Duration in years. Individual is personally liable; company is guarantor.</i>			X		
0F	Construction Loan		X			
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>			X		
18	Credit Card				X	X
47	Credit Line Secured	X				
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 33 for guidelines specific to debit cards.</i>	X			X	X
0C	Debt Buyer				X	
91	Debt Consolidation <i>Represents multiple loans which have been consolidated into one loan.</i>		X			

(continued)

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
8B	Deposit Account with Overdraft Protection <i>Overdrawn account. Refer to Frequently Asked Question 59 for reporting guidelines.</i>				X	
12	Education		X		X	
50	Family Support				X	
05	Federal Housing Administration (FHA) Home Improvement Loan		X			
19	Federal Housing Administration (FHA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>			X		
0G	Flexible Spending Credit Card <i>Credit card with no preset spending limit. The credit card has a Credit Limit, but the terms of the card allow the consumer to exceed that amount. Refer to Frequently Asked Question 51 for reporting guidelines.</i>					X
75	Government Benefit		X		X	
73	Government Employee Advance		X		X	
72	Government Fee for Services		X		X	
71	Government Fine		X		X	
69	Government Grant		X		X	
74	Government Miscellaneous Debt		X		X	
70	Government Overpayment		X		X	

(continued)

CREDIT REPORTING RESOURCE GUIDE®

Copyright 2015 © Consumer Data Industry Association

5-9

EXP/RFlorence 001179

Exhibit 2**Account Type Codes within Portfolio Type**

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
68	Government Secured Direct Loan		X		X	
66	Government Secured Guaranteed Loan		X		X	
67	Government Unsecured Direct Loan		X		X	
65	Government Unsecured Guaranteed Loan		X		X	
6D	Home Equity <i>Installment payments.</i>		X			
89	Home Equity Line of Credit	X				
04	Home Improvement		X			
06	Installment Sales Contract <i>Used by the Retail Industry.</i>		X			
13	Lease <i>Non-auto.</i>		X			
15	Line of Credit <i>Personal line of credit – not secured by collateral. Includes Check Credit.</i>	X				
17	Manufactured Housing		X			
90	Medical Debt		X		X	
20	Note Loan		X			

(continued)

Exhibit 2

Account Type Codes within Portfolio Type

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
03	Partially Secured		X			
5A	Real Estate - Junior Liens and Non-Purchase Money First 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; 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.			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		
11	Recreational Merchandise		X			
29	Rental Agreement		X			
77	Returned Check Reported by Collection Agencies, Debt Buyers 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 15 for reporting requirements.				X	
5B	Second Mortgage Terms Duration in years.			X		

(continued)

Exhibit 2**Account Type Codes within Portfolio Type**

Code	Description	Line of Credit	Installment	Mortgage	Open	Revolving
02	Secured <i>Used for Installment Contracts.</i>		X			
2A	Secured Credit Card <i>Deposited funds are available in the event of default.</i>				X	X
9A	Secured Home Improvement		X			
4D	Telecommunications/Cellular				X	
0A	Time Share Loan <i>A purchased time share.</i>		X			
01	Unsecured		X			
2C	U.S. Department of Agriculture (USDA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>			X		
92	Utility Company					
25	Veteran's Administration (VA) Real Estate Mortgage Loan <i>Terms Duration in years.</i>			X	X	

Note: Account Type Codes 22 (Secured by Household Goods), 23 (Secured by Household Goods & Other Collateral) and 1C (Household Goods) are obsolete as of September 2011 and may no longer be reported.

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.

Terms Frequency Field 14	Terms Duration Field 13	Scheduled Monthly Payment Amount Field 15
D = Deferred	Blank fill	Zero fill
P = Single Payment Loan	001	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

Account Status Codes

Enter the Account Status Code (Field 17A) that properly identifies the current condition of the account as of the Date of Account Information (Field 24).

Code	Description
05 ¹ & 2	Account transferred <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to the Transferred category within Exhibit 6 for a list of Special Comment Codes that should be used instead of Account Status 05. Refer to Frequently Asked Question & Answer 46 for guidance on reporting transferred accounts, and to Frequently Asked Question & Answer 47 for guidance on reporting sold accounts.</i>
11	Current account (0-29 days past the due date) <i>For Installment and Mortgage loans, the account should be current and have a non-zero Balance Amount.</i> <i>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.</i>
13 ¹ & 2	Paid or closed account/zero balance <i>For Installment and Mortgage loans, the account should be paid with a zero Balance Amount.</i> <i>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 may also be reported to indicate the account is closed.</i>
61 ²	Account paid in full, was a voluntary surrender <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 62 for reporting guidelines.</i>
62 ²	Account paid in full, was a collection account <i>Requires Current Balance and Amount Past Due = zero.</i>
63 ²	Account paid in full, was a repossession <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 62 for reporting guidelines.</i>
64 ²	Account paid in full, was a charge-off <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 34(b) for reporting guidelines.</i>
65 ¹ & 2	Account paid in full. A foreclosure was started. <i>Requires Current Balance and Amount Past Due = zero.</i> <i>Refer to Frequently Asked Question & Answer 52 for reporting guidelines.</i>

(continued)

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

² This Account Status Code is considered to be a final status, which does not require further updating.

Exhibit 4

Account Status Codes

Code	Description
71 ¹	Account 30-59 days past the due date
78 ¹	Account 60-89 days past the due date
80 ¹	Account 90-119 days past the due date
82 ¹	Account 120-149 days past the due date
83 ¹	Account 150-179 days past the due date
84 ¹	Account 180 days or more past the due date
88 ²	Claim filed with government for insured portion of balance on a defaulted loan
89 ²	Deed received in lieu of foreclosure on a defaulted mortgage; there may be a balance due <i>Refer to Frequently Asked Question & Answer 53 for reporting guidelines.</i> <i>Note: For credit reporting purposes, do not report Account Status Code 97 (Charge-off) after Account Status 89 has been reported.</i>
93	Account assigned to internal or external collections
94 ²	Foreclosure completed; there may be a balance due <i>Refer to Frequently Asked Question & Answer 52 for reporting guidelines.</i> <i>Note: For credit reporting purposes, do not report Account Status Code 97 (Charge-off) after Account Status 94 has been reported.</i>
95 ²	Voluntary surrender; there may be a balance due <i>Refer to Frequently Asked Question & Answer 62 for reporting guidelines.</i> <i>Note: Do not report Status Code 95 for early termination of leases. Refer to the Leasing category within Exhibit 6 for applicable Special Comments.</i>
96	Merchandise was repossessed; there may be a balance due <i>Refer to Frequently Asked Question & Answer 62 for reporting guidelines.</i>
97	Unpaid balance reported as a loss (charge-off) <i>Refer to Frequently Asked Questions & Answers 34(a) & (c) for reporting guidelines.</i>
DA	Delete entire account (for reasons other than fraud) 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.
DF	Delete entire account due to confirmed fraud (fraud investigation completed)

¹ For Credit Line, Open and Revolving portfolio types, if the account is closed, Special Comment M or Compliance Condition Code XA should also be reported to indicate the account is no longer available for use.

² Field 17B (Payment Rating) is also required when reporting this Account Status Code.

Exhibit 5

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 Date of Account Information. Field 18 contains up to 24 months of consecutive payment activity prior to the current reporting period.

Examples of Account Status and Payment History Profile (PHP):

A. Data furnisher who reports data on the last day of each month:

Account Status Code = 11; Date of Account Information = 01/31/2015 (represents the activity period of 01/01/2015 through 01/31/2015)
 PHP Field 18 = 000011000000EEEE0000BBBB

In the above example, field 18 data represents, from left to right, 12/31/2014 back through 01/31/2013. The E's indicate that the account was current with a zero balance in 12/2013, 11/2013, 10/2013 and 09/2013. The B's indicate that no payment history was available prior to 05/2013, which was most likely the date account was opened.

B. Data furnisher who reports data on the 15th of each month:

Account Status Code = 80; Date of Account Information = 01/15/2015 (represents the activity period of 12/16/2014 through 01/15/2015); Date of First Delinquency = 08/11/2014; PHP Field 18 = 2211100000DD000101000000

In the above example, field 18 data represents, from left to right, data that was reported in the mid-month reporting periods of 12/15/2014 back through 01/15/2013. For example, the first position, which is 2 (60-89 days past the due date) represents that the account was 60 days delinquent in the 11/16/2014 through 12/15/2014 reporting period.

The D's indicate that no payment history was available for 02/2014 or 01/2014.

Note: The Date of First Delinquency (08/11/2014) represents the date of the first 30-day delinquency that led to the status being reported.

(continued)

Exhibit 5

Examples of Reporting Payment History Profile (Field 18)

C. Data furnisher who reports data on the 1st of each month:

Account Status Code = 11; Date of Account Information = 01/01/2015 (represents the activity period of 12/02/2014 through 01/01/2015)
PHP Field 18 = 0EEEEEEEE000EEEE0000EE00

In the above example, field 18 data represents, from left to right, 12/01/2014 back through 01/01/2013. For example, the first position, which is 0 (0-29 days past the due date), represents that the account was current in the 11/2/2014 through 12/01/2014 reporting period.

The E's indicate that the account was current with a zero balance from 11/01/2014 back through 04/01/2014, from 12/01/2013 back through 09/01/2013, and from 04/01/2013 back through 03/01/2013. The account was current (and active) during the other months.

D. Account Status Code = 97; Date of Account Information = 01/31/2015 (represents the activity period of 01/01/2015 through 01/31/2015); Date of First Delinquency = 06/30/2013; PHP Field 18 = LLGGGGGGGG66654332100010

In the above example, field 18 data represents, from left to right, 12/31/2014 back through 01/31/2013. The L's indicate that the account was a charge-off from 12/2014 and 11/2014, and the G's indicate that the account was a collection from 10/2014 back through 03/2014.

Note: The Date of First Delinquency (06/30/2013) represents the date of the 30-day delinquency that led to the charge off being reported.

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Closed (Permanently or Temporarily)	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 amounts.</i>	-	I	-	-	I
	Account Closed at Credit Grantor's Request	M	-	-	M	M
	Credit Line Suspended (Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65.) <i>Definition: The credit line is temporarily unavailable for use.</i>	AP	-	-	AP	AP
	Account Closed Due to Refinance (Refer to Frequently Asked Question 42 for reporting guidelines.)	AS	AS	AS	-	-
	Account Closed Due to Transfer (Refer to Frequently Asked Question 46 for reporting guidelines.) <i>Note: Used for internal transfers.</i>	AT	AT	AT	AT	AT
	Credit Card Lost or Stolen (Refer to Frequently Asked Question 43 for reporting guidelines.)	-	-	-	BL	BL
	Account Closed Due to Inactivity	CI	-	-	CI	CI

(continued)

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Closed (Permanently or Temporarily) (continued)	Credit Line No Longer Available – In Repayment Phase (Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65 and Current Balance should not be zero.) <i>Definition: To be used for line of credit accounts that have two phases: the borrowing phase and the repayment phase. The repayment phase is a natural progression for the account when the consumer is responsible for payment of the outstanding balance and the credit line is no longer available for use.</i>	CJ	-	-	-	-
	Credit Line Suspended due to Collateral Depreciation (Continue to report last assigned Credit Limit. Account Status Code should not be 13 or 61-65.) <i>Definition: To be used for Home Equity and other secured line of credit accounts</i>	CL	-	-	-	-
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 36 for reporting guidelines.)	-	BD	-	-	-

(continued)

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Leasing (continued)	Early Termination/Status Pending (Requires Account Type 3A or 13)	-	BE	-	-	-
	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) <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession) or 96 (Repossession), as applicable.</i>	-	BI	-	-	-
	Involuntary Repossession/Obligation Satisfied (Requires Account Type 3A or 13) <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession) or 96 (Repossession), as applicable.</i>	-	BJ	-	-	-

(continued)

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Leasing (continued)	Involuntary Repossession/Balance Owning (Requires Account Type 3A or 13) <i>Note: Accounts with non-lease type codes should be reported with Account Status 96 (Repossession).</i>	-	BK	-	-	-
	Prepaid Lease (Requires Account Type 3A or 13. Refer to Frequently Asked Question 37 for reporting guidelines.) <i>Definition: Consumer paid lease in advance. No monthly payments are due.</i>	-	BS	-	-	-
Legal Action	Account Payments Assured by Wage Garnishment	AM	AM	AM	AM	AM
Other	Special Handling - Contact Credit Grantor for Additional Information	S	S	S	S	S
	Adjustment Pending <i>Definition: Account adjustment, such as returned merchandise and refund due.</i>	V	V	V	V	V
	First Payment Never Received <i>Note: May indicate fraudulent activity</i>	AV	AV	AV	AV	AV
	Affected by Natural or Declared Disaster (Refer to Frequently Asked Question 58 for reporting guidelines.)	AW	AW	AW	AW	AW
	Redeemed or Reinstated Repossession	-	AZ	-	-	AZ

(continued)

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Other (continued)	Foreclosure Proceedings Started (Refer to Frequently Asked Question 52 for reporting guidelines.)	BO	-	BO	-	-
	Guaranteed/Insured	CH	CH	CH	CH	CH
	Credit Line Reduced due to Collateral Depreciation <i>Definition: To be used for Home Equity or other secured line of credit accounts.</i>	CK	-	-	-	-
	Collateral Released by Creditor / Balance Owing (Account Status Code should not be 13 or 61-65 and Current Balance should not be zero.) <i>Definition: To be used for Mortgages, Home Equity or other secured accounts when the collateral is released, but the consumer still has an outstanding balance to repay.</i>	CM	CM	CM	-	CM
	Loan Modified under a Federal Government Plan	CN	CN	CN	CN	CN
	Loan Modified <i>Definition: To be used when reporting loans that are modified, but not under a Federal Government Plan.</i>	CO	CO	CO	CO	CO
	Used by Child Support Agencies only when reporting delinquent or collection accounts (No actual comment displays)	-	-	-	CS	-

(continued)

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Refinanced	Account Closed Due to Refinance (Refer to Frequently Asked Question 42 for reporting guidelines.)	AS	AS	AS	-	-
Removal of Comment	Removes Any Previously Reported Special Comment Code, or no Special Comment applies for this activity period	BLANK	BLANK	BLANK	BLANK	BLANK
Special Payment Arrangements	Account Payments Managed by Financial Counseling Program <i>Note: Used for external financial counseling programs</i>	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 not be 13 or 61-65)	AB	AB	AB	AB	AB
	Paying Under a Partial Payment Agreement (Account Status Code should not be 13 or 61-65) <i>Definition: An agreed-upon repayment plan with account payments that are less than the original contract's account payments.</i>	AC	AC	AC	AC	AC
	Recalled to Active Military Duty <i>Definition: To be used for reservists; not to be used to identify full time military personnel.</i> <i>Note: A code is not available to report full time military personnel.</i>	AI	AI	AI	AI	AI

(continued)

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Special Payment Arrangements (continued)	Voluntarily Surrendered, then Redeemed or Reinstated	-	AO	-	-	AO
	Account Paid in Full for Less than the Full Balance (Requires Account Status Code 13 or 61-65 and Current Balance = 0. Refer to Frequently Asked Questions 38 and 53 for reporting guidelines.) <i>Definition: To be used when the furnisher accepts payment in full for less than the full balance. Includes short sales.</i>	AU	AU	AU	AU	AU
	Account Paid from Collateral (Requires Account Status Code 13 or 61-65 and Current Balance = 0)	AX	AX	-	-	AX
	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
	Account in Forbearance (Account Status Code should not be 13 or 61-65 and Current Balance should not be zero.)	CP	CP	CP	CP	CP

(continued)

Exhibit 6

Special Comment Codes By Category within Portfolio

Category	Description	Line of Credit	Installment	Mortgage	Open	Revolving
Transferred	Account Closed Due to Transfer (Refer to Frequently Asked Question 46 for reporting guidelines.) <i>Note: Used for internal transfers</i>	AT	AT	AT	AT	AT
	Loan Assumed by Another Party (Requires ECOA Code T — Terminated. Refer to Frequently Asked Question 55 for reporting guidelines.)	-	H	H	-	-
	Account Transferred to Another Company/Service (Refer to Frequently Asked Question 46 for reporting guidelines.)	O	O	O	O	O
	Purchased by Another Company	AH	AH	AH	AH	AH
	Student Loan — Assigned to Government	AL	AL	-	-	-
	Account Acquired by FDIC/NCUA <i>Definition: Federal Deposit Insurance Corp./National Credit Union Administration</i>	AN	AN	AN	AN	AN
	Transferred to Recovery (Requires Account Status Code 71-97) <i>Note: Used for internal transfers</i>	BA	BA	BA	BA	BA

Note: Special Comment Codes AG (Simple Interest Loan) and AJ (Payroll Deduction) are obsolete as of September 2011 and may no longer be reported.

Exhibit 7

Special Comment Codes

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

If more than one Special Comment applies to an account, it is the data furnisher's decision to report the comment that is deemed most important from a business perspective for the current reporting period.

Code	Description
Blank	Removes any previously reported Special Comment Code, or no Special Comment applies for this activity period.
B	Account payments managed by financial counseling program. <i>Note: Used for external financial counseling programs.</i>
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>Refer to Frequently Asked Question 55 for reporting guidelines.</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 company/servicer. <i>Refer to Frequently Asked Question 46 for reporting guidelines.</i>
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 not be 13 or 61-65.</i>
AC	Paying under a partial payment agreement. <i>Account Status Code should not be 13 or 61-65.</i> <i>Definition: An agreed-upon repayment plan with account payments that are less than the original contract's account payments.</i>
AH	Purchased by another company.

(continued)

Exhibit 7

Special Comment Codes

Code	Description
AI	Recalled to active military duty. <i>Definition: To be used for reservists; not to be used to identify full time military personnel.</i> <i>Note: A code is not available to report full time military personnel.</i>
AL	Student loan 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>
AO	Voluntarily surrendered - then redeemed or reinstated.
AP	Credit Line suspended. <i>Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65.</i> <i>Definition: The credit line is temporarily unavailable for use.</i>
AS	Account closed due to refinance. <i>Refer to Frequently Asked Question 42 for reporting guidelines.</i>
AT	Account closed due to transfer. <i>Note: Used for internal transfers.</i> <i>Refer to Frequently Asked Question 46 for reporting guidelines.</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. Refer to Frequently Asked Questions 38 and 53 for reporting guidelines.</i> <i>Definition: To be used when the furnisher accepts payment in full for less than the full balance. Includes short sales.</i>
AV	First payment never received. <i>Comment: May indicate fraudulent activity.</i>
AW	Affected by natural or declared disaster. <i>Refer to Frequently Asked Question 58 for reporting guidelines.</i>
AX	Account paid from collateral. <i>Requires Account Status Code 13 or 61-65 and Current Balance = 0.</i>
AZ	Redeemed or reinstated repossession.
BA	Transferred to Recovery. <i>Requires Account Status Code 71 - 97.</i> <i>Note: Used for internal transfers</i>

(continued)

Exhibit 7

Special Comment Codes

Code	Description
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>
BI	Involuntary repossession. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i> <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession) or 96 (Repossession), as applicable.</i>
BJ	Involuntary repossession/obligation satisfied. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i> <i>Note: Accounts with non-lease type codes should be reported with Account Status 63 (Paid, was a repossession) or 96 (Repossession), as applicable.</i>
BK	Involuntary repossession/balance owing. <i>Requires Account Type 3A (Auto Lease) or 13 (Lease).</i> <i>Note: Accounts with non-lease type codes should be reported with Account Status 96 (Repossession).</i>
BL	Credit card lost or stolen. <i>Refer to Frequently Asked Question 43 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>

(continued)

Exhibit 7

Special Comment Codes

Code	Description
BO	Foreclosure proceedings started. <i>Refer to Frequently Asked Question 52 for reporting guidelines.</i>
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). Definition: Consumer paid lease in advance. No monthly payments are due. Refer to Frequently Asked Question 37 for reporting guidelines.</i>
BT	Principal deferred/Interest payment only.
CH	Guaranteed/Insured.
CI	Account closed due to inactivity.
CJ	Credit line no longer available – in repayment phase. <i>Continue to report the last assigned Credit Limit. Account Status Code should not be 13 or 61-65 and the Current Balance should not be zero. Definition: To be used for line of credit accounts that have two phases: the borrowing phase and the repayment phase. The repayment phase is a natural progression for the account when the consumer is responsible for payment of the outstanding balance and the credit line is no longer available for use.</i>
CK	Credit line reduced due to collateral depreciation. <i>Definition: To be used for Home Equity or other secured line of credit accounts.</i>
CL	Credit line suspended due to collateral depreciation. <i>Continue to report last assigned Credit Limit. Account Status Code should not be 13 or 61-65. Definition: To be used for Home Equity or other secured line of credit accounts.</i>
CM	Collateral released by creditor / Balance owing. <i>Account Status Code should not be 13 or 61-65 and the Current Balance should not be zero. Definition: To be used for Mortgages, Home Equity or other secured accounts when the collateral is released, but the consumer still has an outstanding balance to repay.</i>

(continued)

Exhibit 7

Special Comment Codes

Code	Description
CN	Loan modified under a federal government plan.
CO	Loan modified. <i>Definition: To be used when reporting loans that are modified, but <u>not</u> under a federal government plan.</i>
CP	Account in forbearance. <i>Account Status should not be 13 or 61-65 and the Current Balance should not be zero.</i>
CS	Used by Child Support Agencies only when reporting delinquent or collection accounts. (No actual comment displays.)

Notes: For comments specific to disputes and accounts closed at consumer's request, refer to the Compliance Condition Code (Field 20 and Exhibit 8).

Special Comment Codes AG (Simple Interest Loan) and AJ (Payroll Deduction) are obsolete as of September 2011 and may no longer be reported.

Exhibit 8

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 <i>Definition: Reported when a consumer requested an account be closed.</i>
XB	Account information disputed by consumer under the Fair Credit Reporting Act <i>Definition: Reported when the completeness or accuracy of the account information is disputed by the consumer under the FCRA and investigation of the dispute is in progress by the data furnisher.</i>
XC	Completed investigation of FCRA dispute — consumer disagrees <i>Definition: Reported when the investigation of an FCRA dispute has been completed by the data furnisher; however, the consumer disagrees with the outcome of the investigation.</i>
XD	Account closed at consumer's request and in dispute under FCRA <i>Definition: Combination code reported when two conditions (XA and XB) apply to the account. A consumer requested an account be closed and the completeness or accuracy of the account information is disputed by the consumer under the FCRA and investigation of the dispute is in progress by the data furnisher.</i>
XE	Account closed at consumer's request and dispute investigation completed, consumer disagrees. (To be used for FCRA or FCBA disputes) <i>Definition: Combination code reported when two conditions (XA and XC or XG) apply to the account. A consumer requested an account be closed and the investigation of the dispute has been completed by the data furnisher; however, the consumer disagrees with the outcome of the investigation.</i>
XF	Account in dispute under Fair Credit Billing Act <i>Definition: Reported when information is disputed by the consumer under the FCBA and investigation of the dispute is in progress by the data furnisher.</i>
XG	FCBA Dispute resolved — consumer disagrees <i>Definition: Reported when the investigation of an FCBA dispute has been completed by the data furnisher; however, the consumer disagrees with the outcome of the investigation.</i>
XH	Account previously in dispute — investigation completed, reported by data furnisher (To be used for FCRA or FCBA disputes) <i>Definition: Reported when the investigation of a dispute by the data furnisher was completed.</i>
XJ	Account closed at consumer's request and in dispute under FCBA <i>Definition: Combination code reported when two conditions (XA and XF) apply to the account. A consumer requested an account be closed and information is disputed by the consumer under the FCBA and investigation of the dispute is in progress by the data furnisher.</i>
XR	Removes the most recently reported Compliance Condition Code Note: Do not use XR as a default value. If no Compliance Condition Code applies in the current activity period, blank fill this field.

(continued)

Exhibit 8

Compliance Condition Codes

Important Notes:

When a dispute investigation is completed, it is important to update the Compliance Condition Code to show that the investigation has been completed or to delete the previously-reported Compliance Condition Code. Please consult with your internal Legal counsel regarding which option your company prefers to use; and if you choose to report a code indicating that the investigation has been completed, how long to retain the code on the consumer's file.

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.

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

Date of Account Information	CCC	Action
03/15/2015	XB	XB is added to file.
04/15/2015	Blank	XB is retained.
05/15/2015	Blank	XB is retained.
06/15/2015	Blank	XB is retained.
07/15/2015	XC	XB is replaced with XC.
08/15/2015	Blank	XC is retained.
09/15/2015	XR	XC is removed.

As an option, the code may be reported each month as long as the condition applies.

Date of Account Information	CCC	Action
03/15/2015	XB	XB is added to file.
04/15/2015	XB	XB is retained.
05/15/2015	XB	XB is retained.
06/15/2015	Blank	XB is retained.
07/15/2015	XC	XB is replaced with XC.
08/15/2015	XC	XC is retained.
09/15/2015	XR	XC is removed.

Note: Regardless of the method of reporting, the code will be deleted *only* when another Compliance Condition Code or the **XR** (Removal value) is reported.

Exhibit 9

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: The date in the Date of First Delinquency field must be determined each reporting period based on the following hierarchy:

1. 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.
2. 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.
3. 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 petition or notification. Even though the account is not delinquent, this date is required for purging purposes.

Note: Consumer Information Indicators W, X and Y are obsolete as of September 2010 and may no longer be reported.

If none of the conditions listed in the above hierarchy apply, the Date of First Delinquency should be zero filled.

The following pages contain a flowchart view of the Date of First Delinquency hierarchy, plus several step-by-step examples demonstrating how to report the FCRA Compliance/Date of First Delinquency.

Exhibit 9

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

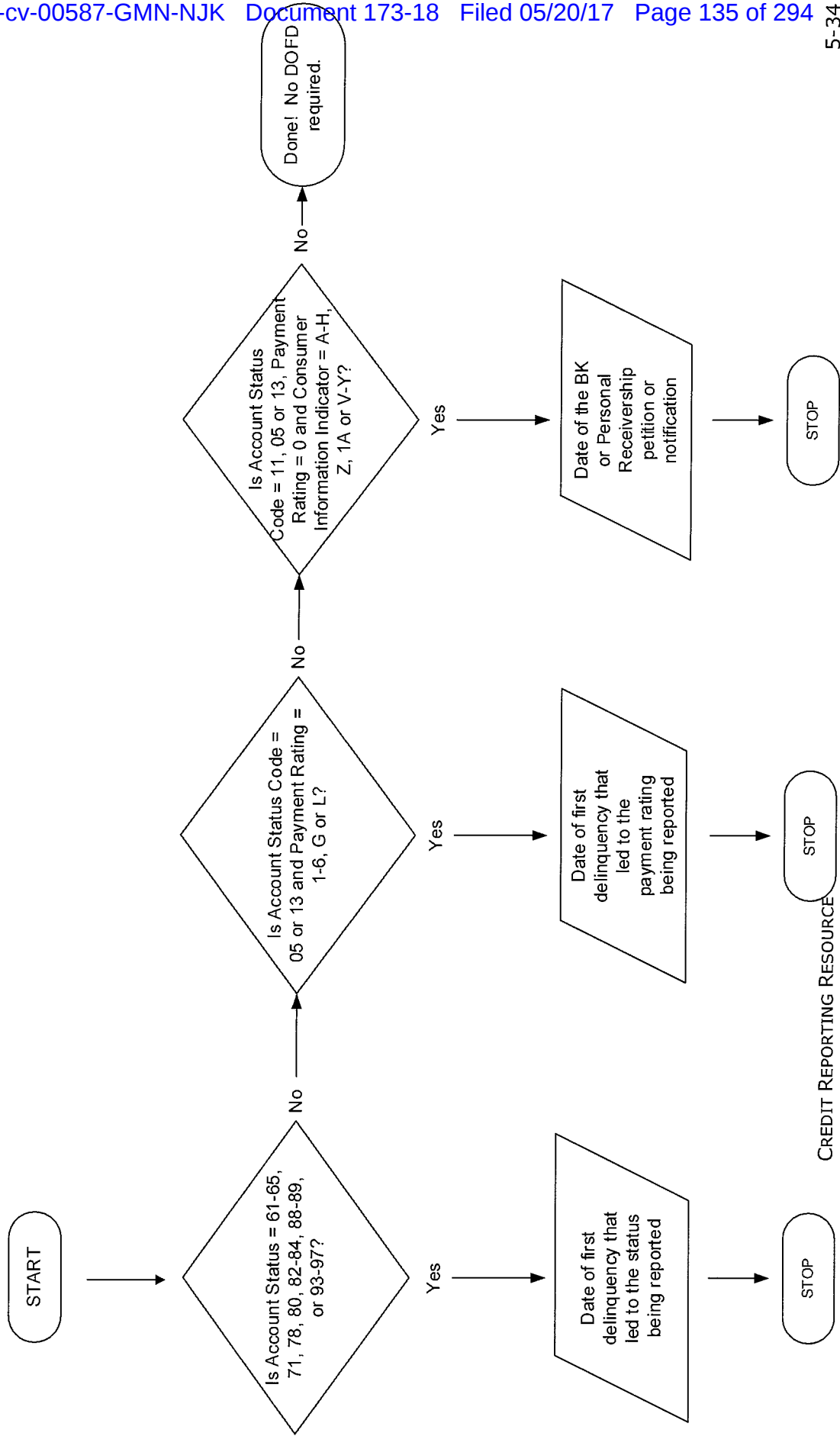


Exhibit 9

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)	Number of Days Past Due Date (Not reported)	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/11/2015	12/20/2014	0	11 Current Account 0-29 days past the due date	Zero fill
02/11/2015	01/20/2015	22	11 Current Account 0-29 days past the due date	Zero fill
03/11/2015	01/20/2015	50	71 30-59 days past the due date	02/19/2015 (First Delinquency)
04/11/2015	01/20/2015	81	78 60-89 days past the due date	02/19/2015
05/11/2015	04/20/2015	21	11 Current Account 0-29 days past the due date	Zero fill
06/11/2015	04/20/2015	52	71 30-59 days past the due date	05/20/2015 (First Delinquency)
07/11/2015	04/20/2015	82	78 60-89 days past the due date	05/20/2015
08/11/2015	04/20/2015	113	80 90-119 days past the due date	05/20/2015
09/11/2015	04/20/2015	144	93 (Collection)	05/20/2015

Note: The month and year reported in the Date of First Delinquency are used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

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)	Number of Days Past Due Date (Not reported)	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/31/2015	01/01/2015	0	11 Current Account 0-29 days past the due date	Zero fill
02/28/2015	02/01/2015	27	11 Current Account 0-29 days past the due date	Zero fill
03/31/2015	02/01/2015	58	71 30-59 days past the due date	03/03/2015 (First Delinquency)
04/30/2015	02/01/2015	88	78 60-89 days past the due date	03/03/2015
05/31/2015	02/01/2015	119	80 90-119 days past the due date	03/03/2015
06/30/2015	02/01/2015	149	82 120-149 days past the due date	03/03/2015
07/31/2015	02/01/2015	180	97 Charge-off	03/03/2015
08/31/2015	All payments made	N/A	64 Paid Charge-off	03/03/2015

Note: The month and year reported in the Date of First Delinquency are used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9**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)	Number of Days Past Due Date (Not reported)	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/11/2015	12/20/2014	21	11 Current Account 0-29 days past the due date	Zero fill
02/11/2015	12/20/2014	52	71 30-59 days past the due date	01/19/2015 (First delinquency)
03/11/2015	01/20/2015	50	71 30-59 days past the due date	01/19/2015
04/11/2015	01/20/2015	81	78 60-89 days past the due date	01/19/2015
05/11/2015	01/20/2015	111	80 90-119 days past the due date	01/19/2015
06/11/2015	04/20/2015	52	71 30-59 days past the due date	01/19/2015
07/11/2015	05/20/2015	52	71 30-59 days past the due date	01/19/2015
08/11/2015	05/20/2015	83	78 60-89 days past the due date	01/19/2015

Note: The month and year reported in the Date of First Delinquency are used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

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

Example 4: Displays an account that has been paid; the Payment Rating is delinquent.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/18/2015	01/15/2015	0	11 Current Account 0-29 days past the due date	Zero fill
02/18/2015	02/15/2015	3	11 Current Account 0-29 days past the due date	Zero fill
03/18/2015	02/15/2015	31	71 30-59 days past the due date	03/17/2015 (First Delinquency)
04/18/2015	02/15/2015	62	78 60-89 days past the due date	03/17/2015
05/18/2015	03/15/2015	64	78 60-89 days past the due date	03/17/2015
06/18/2015	03/15/2015	95	80 90-119 days past the due date	03/17/2015
07/18/2015	03/15/2015	125	82 120-149 days past the due date	03/17/2015
08/15/2015	03/15/2015 Paid in full on 08/15/2015	153 prior to being paid in full	13 Paid Account Payment Rating = 5 150-179 days past the due date	03/17/2015

Note: The month and year reported in the Date of First Delinquency are used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

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

Example 5: Displays an account that was current when included in a Chapter 7 Bankruptcy. Data furnisher only reports Consumer Information Indicator one time to take effect.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definitions Field 17A	Date of First Delinquency (Field 25)
01/18/2015	01/15/2015	0	11 Current	Zero fill
02/18/2015	02/15/2015	0	11 Current	Zero fill
03/18/2015	03/15/2015	0	11 Current Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	03/07/2015 (Bankruptcy Notification Date)
04/18/2015	04/15/2015	0	11 Current Consumer Information Indicator = Blank	Zero fill

Note: The month and year reported in the Date of First Delinquency are used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

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

Example 6: Displays an account that was current when included in a Chapter 7 Bankruptcy. Data furnisher reports Consumer Information Indicator every month as long as it applies.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definitions Field 17A	Date of First Delinquency (Field 25)
01/18/2015	01/15/2015	0	11 Current	Zero fill
02/18/2015	02/15/2015	0	11 Current	Zero fill
03/18/2015	03/15/2015	0	11 Current Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	03/07/2015 (Bankruptcy Notification Date)
04/18/2015	04/15/2015	0	11 Current Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	03/07/2015 (Bankruptcy Notification Date)

Note: The month and year reported in the Date of First Delinquency are used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

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

Example 7: Displays an account that was delinquent before it was included in a Chapter 7 Bankruptcy.

Date of Account Information (Field 24)	Due Date (Not reported)	Number of Days Past Due Date (Not reported)	Account Status & Definition Field 17A	Date of First Delinquency (Field 25)
01/18/2015	01/15/2015	0	11 Current 0-29 days past the due date	Zero fill
02/18/2015	02/15/2015	3	11 Current 0-29 days past the due date	Zero fill
03/18/2015	02/15/2015	31	71 30-59 days past the due date	03/17/2015 (First Delinquency)
04/18/2015	02/15/2015	62	78 60-89 days past the due date	03/17/2015
05/18/2015	03/15/2015	64	78 60-89 days past the due date	03/17/2015
06/18/2015	03/15/2015	95	80 90-119 days past the due date Consumer Information Indicator = A Petition for Chapter 7 Bankruptcy	03/17/2015

Note: The month and year reported in the Date of First Delinquency are used by the consumer reporting agencies for purging purposes.

(continued)

Exhibit 9

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

Fair Credit Reporting Act Excerpts

FCRA Section 605(c) [15 U.S.C. § 1681c(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.

FCRA Section 605(a) [15 U.S.C. § 1681c(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 9

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

Fair Credit Reporting Act Excerpts

FCRA Section 623 [15 U.S.C. § 1681s-2], 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 10

ECOA Codes

The ECOA Code defines the relationship of the consumer to the account in compliance with the Equal Credit Opportunity Act. This code is reported in Field 37 of the Base Segment and Field 10 of the J1 and J2 Segments. Values available:

Code	Description	Definition	Logical Usage
1	Individual	This consumer has contractual responsibility for this account and is primarily responsible for its payment.	<ul style="list-style-type: none"> Most commonly reported in Base Segment May be reported in J1 or J2 Segment when Base Segment consumer is reported with T, X or Z
2	Joint Contractual Liability	This consumer has contractual responsibility for this joint account.	<ul style="list-style-type: none"> Base, J1 or J2 Segment
3	Authorized User	This consumer is an authorized user of this account; another consumer has contractual responsibility.	<ul style="list-style-type: none"> J1 or J2 Segment
5	Co-maker or Guarantor	This consumer is the co-maker or guarantor for this account, who becomes liable if the maker defaults.	<ul style="list-style-type: none"> J1 or J2 Segment May be reported in Base Segment when business is reported in J2 Segment
7	Maker	This consumer is the maker who is liable for the account, but a co-maker or guarantor is liable if the maker defaults.	<ul style="list-style-type: none"> Most commonly reported in Base Segment May be reported in J1 or J2 Segment if more than one maker on account

(continued)

Exhibit 10

ECOA Codes

Code	Description	Definition	Logical Usage
T	Terminated	The association with the account has been terminated by this consumer. Note: Refer to Frequently Asked Question 14(b) for usage guidelines on ECOA Code T.	<ul style="list-style-type: none"> Base, J1 or J2 Segment
X	Deceased	This consumer is deceased.	<ul style="list-style-type: none"> Base, J1 or J2 Segment
W	Business/ Commercial	This code is used to identify that the company reported in the Name field is contractually liable for this account. Note: Refer to Frequently Asked Question 20 for guidelines on reporting consumers who are personally liable for business accounts.	<ul style="list-style-type: none"> J2 Segment
Z	Delete Consumer	This code is used to delete this consumer from the account. Notes: Refer to Frequently Asked Question 14(b) for usage guidelines on ECOA Code Z. <i>Only inaccurately reported consumers should be deleted. Additionally, authorized users may be deleted since they are not contractually responsible for payments.</i>	<ul style="list-style-type: none"> Base, J1 or J2 Segment

Note: ECOA Codes 0 (Undesignated), 4 (Joint) and 6 (On-Behalf-Of) are obsolete as of September 2003 and may no longer be reported.

CREDIT REPORTING RESOURCE GUIDE®

Copyright 2015 © Consumer Data Industry Association

5-45

EXP/RFlorence 001215

Exhibit 11

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	Discharged/Completed through Bankruptcy Chapter 13 (Should be reported when consumer has completed all payments through the Chapter 13 plan)
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 Note: Report indicators with specific bankruptcy chapters, when known.
1A	Personal Receivership
Q	Removes previously reported Bankruptcy Indicator (A through P and Z) or Personal Receivership Indicator (1A). Also used to report Bankruptcies that have been closed or terminated without being discharged or dismissed. Note: Do not report Q as a default value. If no new CII applies in the current activity period, blank fill this field.

(continued)

Exhibit 11

Consumer Information Indicators

Code	Description
R	Reaffirmation of Debt
V	Chapter 7 Reaffirmation of Debt Rescinded
2A	Lease Assumption
S	Removes previously reported Reaffirmation of Debt, Reaffirmation of Debt Rescinded and Lease Assumption Indicators (R, V, 2A, and Obsolete values W, X, Y) Note: Do not report S as a default value. If no new CII applies in the current activity period, blank fill this field.
T	Credit Grantor Cannot Locate Consumer
U	Consumer Now Located (Removes previously reported T Indicator) Note: Do not report U as a default value. If no new CII applies in the current activity period, blank fill this field.

Notes: 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.

Codes W (Chapter 11 Reaffirmation of Debt Rescinded), X (Chapter 12 Reaffirmation of Debt Rescinded) and Y (Chapter 13 Reaffirmation of Debt Rescinded) are obsolete as of September 2010 and may no longer be reported.

(continued)

Exhibit 11

Consumer Information Indicators

Examples of reporting Consumer Information Indicators:

The Consumer Information Indicator should be reported one time and will be deleted only when another Consumer Information Indicator or a Removal value is reported.

Date of Account Information	CII	Action
03/15/2015	A	A is added to file.
04/15/2015	Blank	A is retained.
05/15/2015	Blank	A is retained.
06/15/2015	E	A is replaced by E.
07/15/2015	Blank	E is retained.

As an option, the code may be reported each month as long as the condition applies.

Date of Account Information	CII	Action
03/15/2015	A	A is added to file.
04/15/2015	A	A is retained.
05/15/2015	A	A is retained.
06/15/2015	E	A is replaced by E.
07/15/2015	E	E is retained.
08/15/2015	Blank	E is retained.

Regardless of the method of reporting (one time or each month), the Consumer Information Indicator will be deleted only when another Consumer Information Indicator or a Removal value is reported.

Date of Account Information	CII	Action
03/15/2015	D	D is added to file.
04/15/2015	D	D is retained.
05/15/2015	Blank	D is retained.
06/15/2015	Blank	D is retained.
07/15/2015	Q	D is removed.

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

Exhibit 12

Country Codes

These Country Codes, which are unique to Metro 2®, are used for credit reporting purposes and may differ from codes used by other industries.

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

Exhibit 12

Country Codes

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

Exhibit 13

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.

Use the standard postal abbreviations for state names, such as MS for Mississippi. Refer to Exhibit 14 for a complete list of State Codes.

Notes: If the consumer has a U.S. address and a foreign address, report the U.S. address.

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 14

State Codes

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

Exhibit 15

Data Conversion Checklist

The purpose of the Data Conversion Checklist is to guide data furnishers through one of the following processes by focusing on the critical steps and questions that must be answered.

- Change to a new data processor
- Core system change or conversion (internal in-house system)
- Mergers & Acquisitions
- Coordination of reporting between seller & purchaser of accounts

Data furnishers should contact your data representatives at the consumer reporting agencies early in the process to facilitate a smooth conversion.

Note:

- **External Data Furnisher = Data reported by 3rd Party Data Processor**
- **Internal Data Furnisher = Data reported directly by in-house system**

STEP	TASK DESCRIPTION	CRRG [®] REFERENCE	ANSWERS/COMMENTS
1	Conversion Questions		
	Identify external or internal data furnisher involved.		
	Will new external or internal data furnisher send the data file to same CRAs to which my current processor sends data?		
	Will all portfolios be transferring? If answer is no, which ones will be transferring?		
	Will all accounts be transferring; specifically will paid, transferred and derogatory accounts be transferring?		
	What is the expected date of conversion?		
	What is the approximate number of accounts that are transferring?		
	What Identification Number is currently reported?	Page 4-6	

(continued)

Exhibit 15

Data Conversion Checklist

STEP	TASK DESCRIPTION	CRRG® REFERENCE	ANSWERS/COMMENTS
	What is the Identification Number used by new external or internal data furnisher?	Page 4-6	
	Will format of the account numbers change? If so, provide specifics (e.g.; append or prepend any digits/characters to the Account Number).	Page 4-6	
	If Identification Number or Account Number is changing, will the L1 Change Segment be reported?	Pages 4-42 & 4-43; See FAQ 5	
	Will the Portfolio Types remain the same?	Page 4-7	
	Will the Account Types remain the same?	Page 4-7; See Exhibits 1 & 2	
	Will the Dates Opened remain the same?	Page 4-7	
	Will the Credit Limits remain the same?	Page 4-8	
	Will the Highest Credit or Original Loan Amounts remain the same?	Page 4-8	
	Will new external or internal data furnisher report the Payment History Profile (up to 24 months)?	Page 4-12; See FAQs 22 & 41 and Exhibit 5	
	Will previously-reported history be included with the first submission or will payment history only be reported going forward?	Page 4-12; See FAQs 22 & 41 and Exhibit 5	
	Ensure that the FCRA Compliance/Date of First Delinquency is accurate & consistent with prior reporting.	See FAQ 22 and Exhibit 9	

(continued)

Exhibit 15

Data Conversion Checklist

STEP	TASK DESCRIPTION	ANSWERS/COMMENTS
2	<i>Contact your data rep at each CRA in advance to notify them about the conversion.</i>	
	Provide to the CRAs the technical contact's email address & phone number for new external or internal data furnisher.	
	Provide this checklist with answers to your data representative at each CRA.	

3666 FORMAT - DATA RECORD (VARIABLE BLOCKED)

Note: The Block Descriptor Word shifts the first record of each block over 4 positions.

[illegible]

(continued)

366 FORMAT - TRAILER RECORD (VARIABLE BLOCKED)

Note: The Block Descriptor Word shifts the first record of each block over 4 positions.

[illegible]

(continued)

CREDIT REPORTING RESOURCE GUIDE®
Copyright 2015 © Consumer Data Industry Association

5-58

EXP/RFlorence 001228

POS.	1-4	=	Block Descriptor Word
POS.	5-8	=	Record Descriptor Word
POS.	9-15	=	Record Identifier
POS.	16-20	=	Total Base Records
POS.	21-25	=	Reserved
POS.	26-30	=	Total Status DF
POS.	31-35	=	Total J1 Segments
POS.	36-40	=	Total J2 Segments
POS.	41-45	=	Block Count
POS.	46-50	=	Total Status DA
POS.	51-55	=	Total Status 05
POS.	56-60	=	Total Status 11
POS.	61-65	=	Total Status 13
POS.	66-70	=	Total Status 61
POS.	71-75	=	Total Status 62
POS.	76-80	=	Total Status 63
POS.	81-85	=	Total Status 64
POS.	86-90	=	Total Status 65
POS.	91-95	=	Total Status 71
POS.	96-100	=	Total Status 78
POS.	101-105	=	Total Status 80
POS.	106-110	=	Total Status 82
POS.	111-115	=	Total Status 83
POS.	116-120	=	Total Status 84
POS.	121-125	=	Total Status 88
POS.	126-130	=	Total Status 89
POS.	131-135	=	Total Status 93
POS.	136-140	=	Total Status 94
POS.	141-145	=	Total Status 95
POS.	146-150	=	Total Status 96
POS.	151-155	=	Total Status 97
POS.	156-160	=	Total ECOA 2
POS.	161-165	=	Total Employment Segs
POS.	166-170	=	Total Orig Cred Segs
POS.	171-175	=	Total Purch/Sold Segs
POS.	176-180	=	Total Mort Info Segs
POS.	181-185	=	Total Spec Pymnt Segs
POS.	186-190	=	Total Change Segs
POS.	191-195	=	Total SSN All
POS.	196-200	=	Total SSN Base
POS.	201-205	=	Total SSN J1
POS.	206-210	=	Total SSN J2
POS.	211-215	=	Total Birthday All
POS.	216-220	=	Total Birthday Base
POS.	221-225	=	Total Birthday J1
POS.	226-230	=	Total Birthday J2
POS.	231-235	=	Total Phone # All
POS.	236-370	=	Reserved

426 FORMAT - HEADER RECORD (FIXED LENGTH)

[illegible]

```
...continue to blank-fill out to 1364 characters...
```

[illegible]

(continued)

POS.	1-	4	=	Record Descriptor Word
POS.	5-	10	=	Record Identifier
POS.	11-	12	=	Cycle Identifier
POS.	13-	22	=	Innovis Program ID
POS.	23-	32	=	Equifax Program ID
POS.	33-	37	=	Experian Program ID
POS.	38-	47	=	TransUnion Program ID
POS.	48-	55	=	Activity Date
POS.	56-	63	=	Date Created
POS.	64-	71	=	Program Date
POS.	72-	79	=	Program Revision Date
POS.	80-	119	=	Reporter Name
POS.	120-	215	=	Reporter Address
POS.	216-	225	=	Reporter Phone #
POS.	226-	265	=	Software Vendor Name
POS.	266-	270	=	Software Version #
POS.	271-	280	=	MicroBilt/PBRC Prog. ID
POS.	281-	426	=	Reserved
POS.	427-	1364	=	Blank Fill

426 FORMAT - DATA RECORD (FIXED LENGTH)

[illegible]

(continued)

426 FORMAT - DATA RECORD (FIXED LENGTH) CONTINUED

CHAR ID NUMBER NIEMPLOYER NAME 1ST LINE OF EMPLOYER ADDRESS 2ND LINE OF EMPLOY
 ZONE 4CC4DEDCD4444444DFCDDDDDCD4DC4444444FEE4DCDC4DC4CDDDDDCD4CCDCCEE4444FDC4DCDC4DC4CDDDDDE
 NUMR 09405442590000000051547368590514500000000000000012303955066054736859014495220000254039550660547368
 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 CD4CCDCCEE4444CDDDDDCD4CCCEE444444EEFFFFFDDCEDCECD444444444
 NUMR 59014495220000547368590393800000002312345123463347139650000000000
 1301...5...10...15...20...25...30...35...40...45...50...55...60...6

See Attachment for Segment
 definitions.

(continued)

426 FORMAT - TRAILER RECORD (FIXED LENGTH)

[illegible]

(continued)

ATTACHMENT - SEGMENT DEFINITIONS

J1 Segment	Pos.	1- 2 = Segment Identifier	K3 Segment	Pos.	1- 2 = Segment Identifier
	Pos.	3 = Consumer Transaction Type		Pos.	3- 4 = Agency Identifier
	Pos.	4- 28 = Surname		Pos.	5-22 = Account Number
	Pos.	29- 48 = First Name		Pos.	23-40 = Mortgage Identification Number
	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			
J2 Segment	Pos.	98- 99 = Consumer Information Indicator	K4 Segment	Pos.	1- 2 = Segment Identifier
	Pos.	100 = Reserved		Pos.	3- 4 = Specialized Payment Indicator
				Pos.	5-12 = Deferred Payment Start Date
				Pos.	13-20 = Balloon Payment Due Date
				Pos.	21-29 = Balloon Payment Amount
				Pos.	30 = Reserved
J3 Segment	Pos.	1- 2 = Segment Identifier	L1 Segment	Pos.	1- 2 = Segment Identifier
	Pos.	3 = Consumer Transaction Type		Pos.	3 = Change Indicator
	Pos.	4- 28 = Surname		Pos.	4-33 = New Account Number
	Pos.	29- 48 = First Name		Pos.	34-53 = New Identification Number
	Pos.	49- 68 = Middle Name		Pos.	54 = Reserved
	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			
J4 Segment	Pos.	98- 99 = Consumer Information Indicator	N1 Segment	Pos.	1- 2 = Segment Identifier
	Pos.	100 = Reserved		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
K1 Segment	Pos.	1- 2 = Segment Identifier	K2 Segment	Pos.	1- 2 = Segment Identifier
	Pos.	3-32 = Original Creditor Name		Pos.	3 = Purchased From/Sold To Indicator
	Pos.	33-34 = Creditor Classification		Pos.	4-33 = Purchased From or Sold To Name
				Pos.	34 = Reserved

Frequently Asked Questions and Answers

Segments and Appendages (6-5)

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 (6-7)

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

Delinquency Reporting (6-7)

10. How are delinquencies calculated?

Cycle Reporting (6-7)

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

Account Status, Payment Rating, Special Comment (6-8)

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

ECOA Requirements (6-9)

13. How do I comply with ECOA?
14. ECOA Codes:
 - (a) How is an ECOA change reported?
 - (b) What is the difference between ECOA Codes T (Association with Account Terminated) and Z (Delete Consumer)?

(continued)

Frequently Asked Questions and Answers

FCRA Requirements (6-10)

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

Deleting Accounts/Borrowers (6-11)

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

Consumer Information (6-12)

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

Duplicate Tradelines (6-13)

21. What causes duplicate tradelines?

First Time Reporters (6-14)

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

Accounts Included in Bankruptcy (6-15)

23. How should an account be reported when the consumer files bankruptcy, but the account is not included in the bankruptcy?
24. How should an account included in bankruptcy be reported if a "Relief from Stay" is granted to the creditor?
25. How should an account that has been included in Bankruptcy be reported when a consumer is making payments or has paid the account in full, even though the account has not been reaffirmed?
26. Is there a preferred method of reporting when accounts are completely or partially reaffirmed in bankruptcy?
27. Accounts included in Bankruptcy Chapter 7, 11 or 12:
(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 7, 11 or 12?
(b) How should an account be reported when one borrower filed Bankruptcy Chapter 7, 11 or 12 and the other borrower did not?

(continued)

Frequently Asked Questions and Answers

Accounts Included in Bankruptcy (6-21)

28. Accounts included in Bankruptcy Chapter 13:
 - (a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 13?
 - (b) How should an account be reported when one borrower filed Bankruptcy Chapter 13 and the other borrower did not?
29. How should a secured debt (e.g., mortgage account) be reported when a consumer completes the required payments through a Bankruptcy Chapter 12 or 13 plan, but the account is still open and the consumer is continuing to make payments?
30. How should multiple bankruptcies (i.e., the same or different chapters) be reported for the different associated borrowers on an account?
31. How should bankruptcies be reported when the consumer voluntarily surrenders the merchandise or redeems the merchandise?
32. How should an account be reported when a Bankruptcy case has been closed or terminated without being discharged or dismissed?

Reporting Scenarios (6-33)

33. When and how should Debit Cards be reported?
34. Charge-offs:
 - (a) How should charged off accounts be reported?
 - (b) How should paid charge-off accounts be reported?
 - (c) Is there a preferred method of reporting when an account is partially charged off?
35. If a credit card or account is in dispute or temporarily unavailable for use because the credit grantor is conducting an investigation (due to a request from the consumer, such as potential identity theft or other reason), how should the account be reported?
36. 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?
37. How should an account be reported when an auto lease is prepaid – where entire lease payment is paid at the time of opening?
38. How should accounts that are paid in full for less than the full balance (i.e., settled) be reported?
39. How should a paid in full, closed account be reported?
40. How should a closed account be reported that has an outstanding balance?
41. How long should paid accounts (Account Status Code 13, 61-65) continue to be reported?
42. How should a renegotiated/refinanced loan be reported?
43. How should lost or stolen credit cards be reported?

(continued)

Frequently Asked Questions and Answers

Reporting Scenarios (6-42)

44. How should deferred loans be reported?
45. How should accounts in forbearance be reported?
46. How should accounts that have been transferred be reported?
47. How should accounts that have been sold to another company be reported?
48. How should accounts that have been purchased from another company be reported?
49. How are "payment reversal" transactions handled when reporting Date of Last Payment, Date of First Delinquency, Payment History Profile and Actual Payment Amount?
50. 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?
51. How should credit cards with no preset spending limits be reported that have terms allowing consumers to exceed the credit limits (i.e., Flexible Spending Credit Cards)?
52. How should the different stages of foreclosure be reported?
53. How should alternatives to foreclosure (i.e., Deed in Lieu and Short Sale) be reported?
54. How should a secured account (i.e., mortgage, home equity or other secured account) be reported when the collateral is released but there is an outstanding balance due?
55. How should full loan assumptions be reported?
56. How should simple loan assumptions be reported?
57. How should reverse mortgages be reported?
58. How should an account be reported when the consumer is affected by a natural or declared disaster?
59. How should deposit accounts, with overdraft protection, be reported that have been overdrawn?
60. How should prepaid credit cards/gift cards be reported?
61. How should an account be reported when it is included in a Personal Receivership plan (Wisconsin Chapter 128)?
62. How should an account be reported when merchandise has been repossessed or the consumer has voluntarily surrendered the merchandise?
63. How should a replacement credit card be reported (i.e., credit card replaced with a new account number)?
64. How should an account be reported when the creditor files a Form 1099-C (Cancellation of Debt) with the IRS?
65. How should timeshare mortgages and timeshare loans be reported?

Frequently Asked Questions and Answers

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

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

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

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.

Frequently Asked Questions and Answers

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. Questions: ECOA Codes:

(a) How is an ECOA Code change reported?

Answer: Change the ECOA Code to the new value in the segment that has changed. Refer to field descriptions for each segment (Base, J1 and J2) for lists of applicable ECOA codes.

(b) What is the difference between ECOA Codes T (Association with Account Terminated) and Z (Delete Consumer)?

Answer: ECOA Code 'T' should be reported when a consumer is no longer associated with an account. In subsequent reporting periods, this consumer should not be reported. The account, including payment history reported prior to the termination will be retained, but future updates will not be applied to the account for this consumer.

ECOA Code 'Z' should be reported when a consumer was reported in error and the account, including payment history, should be deleted from this consumer's file. It is imperative that ECOA Code 'Z' is reported only on the consumer who was inaccurately reported. In subsequent reporting periods, this consumer should not be reported.

Note: Only inaccurately reported consumers should be deleted.

Frequently Asked Questions and Answers

FCRA REQUIREMENTS

15. 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, debt buyers 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; i.e., the name of the company to which the check was written. Report the Creditor Classification (K1 Segment Field 3) to identify the original creditor's type of business. Note that code 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.
- 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.

Frequently Asked Questions and Answers

DELETING ACCOUNTS/BORROWERS

16. Question: How should 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

CONSUMER INFORMATION

17. 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.

18. 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.

19. 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.

If only one borrower is associated with the account and the borrower is reported as deceased, discontinue reporting the entire account after the ECOA Code **X** is reported. Do not report the account with a trustee or estate name.

If there are multiple associated borrowers and one borrower is reported as deceased, continue reporting the account, but discontinue reporting the deceased borrower after the ECOA Code **X** is reported. If the deceased borrower had been reported in the Base Segment, another borrower must be moved into the Base Segment for subsequent reporting.

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.

Frequently Asked Questions and Answers

20. 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 ECOA Code **2** (Joint/Contractual Liability) or **5** (Co-maker or Guarantor) in Field 37, as applicable.
- Report the business name in the J2 Segment starting in the Surname field (Field 3). The business name may continue into the First and Middle Name fields if needed.
- Report ECOA Code **W** (Business/Commercial) in Field 10 of the J2 Segment.

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

DUPLICATE TRADELINES

21. 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.

Frequently Asked Questions and Answers

FIRST TIME REPORTERS

22. 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 = 09/30/2015
Date of First Delinquency = 11/30/2013

In the above example, 11/30/2013 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 = 000000GGGGGGGGGGGGGGGGGGGG
Date of Account Information = 09/30/2015
Date of First Delinquency = 03/31/2012

In the above example, 03/31/2012 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

ACCOUNTS INCLUDED IN BANKRUPTCY

Please note that within these reporting guidelines, certain fields are mentioned that provide specific guidance for the situations described. For all other Metro 2® fields, the standard guidelines described within the Field Definitions module should be followed.

23. Question: How should an account be reported when the consumer files bankruptcy, but the account is not included in the bankruptcy?

Answer: For accounts that are not discharged in the bankruptcy, follow these guidelines:

- When notified of the petition, report the applicable Consumer Information Indicator.
Note: The consumer may be protected by the automatic stay until the bankruptcy is discharged or, for Chapter 13, the repayment plan is completed.
- Follow the guidance in FAQ 27 or 28, as applicable, for the months between petition and final resolution.
- For Chapter 7, 11 or 12, when the bankruptcy is discharged, report Consumer Information Indicator **Q** to remove the petition indicator and continue reporting the account normally going forward.
- For Chapter 13, when the repayment plan is completed, report Consumer Information Indicator **Q** to remove the petition indicator and continue reporting the account normally going forward. If an associated borrower who was not included in the bankruptcy filing had been terminated from the account, re-report this borrower with the applicable ECOA Code (not T).

24. 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.

Frequently Asked Questions and Answers

- 25. Question: How should an account that has been included in Bankruptcy be reported when a consumer is making payments or has paid the account in full, even though the account has not been reaffirmed?**

Answer: Unless the account has been reaffirmed through the Bankruptcy Court, the account is included in Bankruptcy. For credit reporting purposes, the appropriate Bankruptcy Consumer Information Indicator must be reported.

Refer to Frequently Asked Questions 27 and 28 for detailed reporting guidelines.

- 26. 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.

If the partial Reaffirmation of Debt is subsequently rescinded, report the new account with Account Status Code **DA** to delete the account. The original account, which was reported with the appropriate bankruptcy Consumer Information Indicator, will reflect that the account is included in bankruptcy.

Frequently Asked Questions and Answers

27. Questions: Accounts included in Bankruptcy Chapter 7, 11 or 12:

(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 7, 11 or 12?

Answer: Report the account according to the following guidelines:

	All Borrowers Filed Bankruptcy Chapter 7, 11 or 12
Month BK Filed	<ul style="list-style-type: none"> • CII = A, B or C (Petition for Chapter 7, 11 or 12 Bankruptcy) • Account Status = status at time of petition • Payment History = first character based on previous month's status plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should either be terminated (ECOA Code T) or deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution (Reaffirmation of Debt, Lease Assumption, Discharged, Dismissed, Withdrawn)	<ul style="list-style-type: none"> • CII = Blank (previous petition value reported is retained) or CII = A, B or C • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus history reported prior to bankruptcy filing) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date
Reaffirmation of Debt or Lease Assumption	<ul style="list-style-type: none"> • CII = R (Reaffirmation of Debt) or 2A (Lease Assumption) • Account information as it applies going forward
BK Discharged	<ul style="list-style-type: none"> • CII = E, F or G (Discharged through BK Chapter 7, 11 or 12) • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Note: After reporting the discharge CII for all Filers, discontinue reporting the account.</p>

FAQ 27(a) continued on next page

Frequently Asked Questions and Answers

FAQ 27(a) (continued)

	All Borrowers Filed Bankruptcy Chapter 7, 11 or 12
Reaffirmation of Debt Rescinded	<ul style="list-style-type: none"> • CII = V (Chapter 7 Reaffirmation of Debt Rescinded) • Account Status = status at time of petition • Payment History = increment first position based on previous month's Account Status, plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Note: After reporting CII 'V' for all Filers, if the bankruptcy has been discharged, discontinue reporting the account. If the bankruptcy has not yet been discharged, continue reporting the account and Filers with the applicable CIIs.</p>
BK Dismissed	<ul style="list-style-type: none"> • CII = I, J or K (BK Chapter 7, 11 or 12 Dismissed) • Account information as it applies going forward
BK Withdrawn	<ul style="list-style-type: none"> • CII = M, N or O (BK Chapter 7, 11 or 12 Withdrawn) • Account information as it applies going forward

Frequently Asked Questions and Answers

27(b) How should an account be reported when one borrower filed Bankruptcy Chapter 7, 11 or 12 and the other borrower did not?

Answer: Report the account according to the following guidelines:

	Filer(s) and Non-filer(s)
Month BK Filed	<ul style="list-style-type: none"> CII for Filer(s) = A, B or C (Petition for BK Chapter 7, 11 or 12) CII for Non-filer(s) = Blank Account Status = applicable status for consumer(s) who did <u>not</u> file Bankruptcy Payment History = first character based on previous month's status plus prior history Current Balance = outstanding balance amount Scheduled Monthly Payment Amount = contractual monthly payment amount Amount Past Due = dependent on status <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should either be terminated (ECOA Code T) or deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution (Reaffirmation of Debt, Lease Assumption, Discharged, Dismissed, Withdrawn)	<ul style="list-style-type: none"> CII for Filer(s) = Blank (previous petition value reported is retained) or CII = A, B or C CII for Non-filer(s) = Blank Account Status = applicable status for consumer(s) who did <u>not</u> file Bankruptcy Account information as it applies going forward for the Non-filer(s)
Reaffirmation of Debt or Lease Assumption	<ul style="list-style-type: none"> CII for Filer(s) = R (Reaffirmation of Debt) or 2A (Lease Assumption) CII for Non-filer(s) = Blank Account information as it applies going forward
BK Discharged	<ul style="list-style-type: none"> CII for Filer(s) = E, F or G (Discharged through BK Chapter 7, 11 or 12) CII for Non-filer(s) = Blank Account information as it applies going forward for the Non-filer(s) <p>Note: After reporting the discharge CII for the Filer(s), discontinue reporting the Filer(s).</p>

FAQ 27(b) continued on next page

Frequently Asked Questions and Answers

FAQ 27(b) (continued)

	Filer(s) and Non-filer(s)
Reaffirmation of Debt Rescinded	<ul style="list-style-type: none"> • CII for Filer(s) = V (Chapter 7 Reaffirmation of Debt Rescinded) • CII for Non-filer(s) = Blank • Account information as it applies going forward for the Non-filer(s) <p>Note: After reporting CII 'V' for the Filer(s), if the bankruptcy has been discharged, discontinue reporting the Filer(s). If the bankruptcy has not yet been discharged, continue reporting the account and Filer(s) with the applicable CIIs.</p>
BK Dismissed or Withdrawn	<ul style="list-style-type: none"> • CII for Filer(s) = I, J or K (Dismissed through BK Chapter 7, 11 or 12) or M, N or O (Withdrawn through BK Chapter 7, 11 or 12) • CII for Non-filer(s) = Blank • Account information as it applies going forward

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

Frequently Asked Questions and Answers

28. Questions: Accounts included in Bankruptcy Chapter 13:

(a) How should an account be reported when all borrowers associated to the account filed Bankruptcy Chapter 13?

Answer: Report the account according to the following guidelines:

	All Borrowers Filed Bankruptcy Chapter 13
Month BK Filed	<ul style="list-style-type: none"> • CII = D (Petition for Chapter 13 Bankruptcy) • Account Status = status at time of petition • Payment History = first character based on previous month's Account Status, plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should either be terminated (ECOA Code T) or deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution (Confirmed Plan, BK Dismissed, Withdrawn)	<ul style="list-style-type: none"> • CII = Blank (previous value reported is retained) or CII = D • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus history reported prior to BK filing) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date
BK Chapter 13 Converted to BK Chapter 7	<ul style="list-style-type: none"> • CII = A (Petition for Chapter 7 Bankruptcy) or E (Discharged through Bankruptcy Chapter 7), as applicable <p>Note: With the reporting of the BK Chapter 7 indicator, continue updating the account by following FAQ 27(a).</p>

FAQ 28(a) continued on next page

Frequently Asked Questions and Answers

FAQ 28(a) (continued)

	All Borrowers Filed Bankruptcy Chapter 13
Plan Confirmed	<ul style="list-style-type: none"> • CII = Blank (previous value reported is retained) or CII = D • Account Status = status at time of petition • Payment History = increment with value 'D' (plus prior months' history) • Current Balance = Chapter 13 plan balance¹, which should decline as payments are made • Amount Past Due = Zero • Terms Duration & Terms Frequency = report changed values, if applicable • Scheduled Monthly Payment Amount = Chapter 13 plan payment amount • Date of Account Information = current month's date
Plan Completed – All payments made according to plan – no further obligation	<ul style="list-style-type: none"> • CII = H (Discharged/completed through BK Chapter 13) • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = Zero • Scheduled Monthly Payment Amount = Zero • Amount Past Due = Zero • Date of Account Information = current month's date <p>Note: After reporting CII 'H' for all Filers, discontinue reporting the account.</p>
Plan Completed – All payments made according to plan – consumer continues to make payments on Secured Debt (example: mortgage)	<ul style="list-style-type: none"> • CII = Q (Removal value) • Account Status = status that applies • Payment History = first month, increment first position with value 'D'; in subsequent months, increment based on prior month's status • Current Balance = Outstanding balance amount • Scheduled Monthly Payment Amount = updated contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date
BK Dismissed or Withdrawn	<ul style="list-style-type: none"> • CII = applicable dismissed or withdrawn value (L or P) • Account information as it applies going forward

¹ If the Chapter 13 plan balance amount is not clearly communicated to the lender, the lender should consult with internal Legal to determine what amount to report in the Current Balance field. If the lender (e.g., unsecured creditor) does not receive a confirmed amount from the Bankruptcy court, report the outstanding balance.

Frequently Asked Questions and Answers

28(b) How should an account be reported when one borrower filed Bankruptcy Chapter 13 and the other borrower did not?

Answer: When a Bankruptcy Chapter 13 is filed by one borrower and there is also a non-filer associated to the account, both may be protected by an automatic stay. The non-filer may be protected through the completion of the plan. Therefore, the non-filer should be terminated from the account until the plan is completed.

	Filer(s)	Non-filer(s) – Protected by Stay through plan completion
Month BK Filed	<ul style="list-style-type: none"> • CII = D (Petition for Chapter 13 BK) • Account Status = status at time of petition • Payment History = first character based on previous month's status, plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date 	<ul style="list-style-type: none"> • CII = Blank • ECOA Code = T (Terminated) <p>Note: Authorized Users (ECOA Code 3) on accounts included in a bankruptcy petition should either be terminated (ECOA Code T) or deleted (ECOA Code Z) from the account because they are not contractually liable for payments.</p>
Months Between Petition Filed & BK Resolution (Confirmed Plan, BK Dismissed, Withdrawn)	<ul style="list-style-type: none"> • CII = Blank (previous petition value reported is retained) or CII = D • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus history reported prior to BK filing) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date 	Do not report non-filer(s).

FAQ 28(b) continued on next page

Frequently Asked Questions and Answers

FAQ 28(b) (continued)

	Filer(s)	Non-filer(s) – Protected by Stay through plan completion
BK Chapter 13 Converted to BK Chapter 7	<ul style="list-style-type: none"> CII = A (Petition for Chapter 7 Bankruptcy) or E (Discharged through Bankruptcy Chapter 7), as applicable <p>Note: With the reporting of the BK Chapter 7 indicator, continue updating the account by following FAQ 27(b).</p>	<ul style="list-style-type: none"> ECOA = original value that defines the consumer's relationship to the account (not T) CII = Blank <p>Note: At this point, continue updating the account by following FAQ 27(b).</p>
Plan Confirmed	<ul style="list-style-type: none"> CII = Blank (previous petition value reported is retained) or CII = D Account Status = status at time of petition Payment History = increment with value 'D' (plus prior months' history) Current Balance = Chapter 13 plan balance¹, which should decline as payments are made Amount Past Due = Zero Terms Duration & Terms Frequency = report changed values, if applicable Scheduled Monthly Payment Amount = Chapter 13 plan payment amount Date of Account Information = current month's date 	Do not report non-filer(s).

FAQ 28(b) continued on next page

¹ If the Chapter 13 plan balance amount is not clearly communicated to the lender, the lender should consult with internal Legal to determine what amount to report in the Current Balance field. If the lender (e.g., unsecured creditor) does not receive a confirmed amount from the Bankruptcy court, report the outstanding balance.

Frequently Asked Questions and Answers

FAQ 28(b) (continued)

	Filer(s)	Non-filer(s) – Protected by Stay through plan completion
Plan Completed – All payments made according to plan – no further obligation by filer	<ul style="list-style-type: none"> • CII = H (Discharged/completed through BK Chapter 13) • Account Status = status at time of petition • Payment History = increment first position with value 'D' (plus prior months' history) • Current Balance = Zero • Scheduled Monthly Payment Amount = Zero • Amount Past Due = Zero • Date of Account Information = current month's date <p>Discontinue reporting Filer after this month.</p>	<p>If creditor intends to collect additional monies from non-filer after case is closed (plan payments completed), non-filer can be reported <u>at least one month after</u> the CII H is reported for the filer.</p> <p>First month:</p> <ul style="list-style-type: none"> • ECOA = applicable value, such as 1 or 2 (not T) • Account Status = applicable status at time of reporting • Payment History Profile = D-fill • Current Balance = remaining balance owed on account • Scheduled Monthly Payment Amount = as scheduled for the non-filer(s) going forward • Amount Past Due = if applicable • DOFD = based on Account Status <p>In subsequent months, standard updating should be done - account information as it applies to non-filer(s).</p>
Plan Completed – All payments made according to plan – consumer continues to make payments on Secured Debt (example: mortgage)	<ul style="list-style-type: none"> • CII = Q (Removal Value) • Account Status = status that applies • Payment History = first month, increment first position with value 'D'; in subsequent months, increment based on prior month's status • Current Balance = Outstanding balance amount • Scheduled Monthly Payment Amount = updated contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date 	<p>Non-filer can be re-reported in the same month CII Q is reported for the filer.</p> <ul style="list-style-type: none"> • CII = Blank • ECOA = applicable value, such as 2 (not T)
BK Dismissed or Withdrawn	<ul style="list-style-type: none"> • CII = applicable dismissed or withdrawn value (L or P) • Account information as it applies going forward 	<p>Re-report non-filer(s).</p> <ul style="list-style-type: none"> • CII = Blank • ECOA = applicable value, such as 2 (not T)

Frequently Asked Questions and Answers

- 29. Question: How should a secured debt (e.g., mortgage account) be reported when a consumer completes the required payments through a Bankruptcy Chapter 12 or 13 plan, but the account is still open and the consumer is continuing to make payments?**

Answer: While the consumer is making payments through the plan, Consumer Information Indicator **C** (Petition for Chapter 12 Bankruptcy) or **D** (Petition for Chapter 13 Bankruptcy) should be reported. If the account is still open when the plan payments have been completed, report Consumer Information Indicator **Q** to remove the petition indicator so that ongoing payments made by the consumer can be reported.

Frequently Asked Questions and Answers

30. Question: How should multiple bankruptcies (i.e., the same or different chapters) be reported for the different associated borrowers on an account?

Answer: Report the account according to the following guidelines:

A	Both borrowers file Bankruptcy Chapter 7 in the same reporting period.	Follow FAQ 27(a).
B	Borrower 1 files Bankruptcy Chapter 7 – Borrower 2 is a non-filer. At a later time, Borrower 2 files Bankruptcy Chapter 7.	<p>When Borrower 1 files BK Chapter 7, follow FAQ 27(b) because at this time, there is also a non-filer on this account. Therefore, for the account level fields, report account information for the consumer who did <u>not</u> file the bankruptcy.</p> <p>When Borrower 2 files BK Chapter 7 at a later date, begin following FAQ 27(a) since all borrowers are now filers.</p> <ul style="list-style-type: none"> • Reaffirmation of Debt – If Borrower 1 reaffirms the debt, report CII = R. As per FAQ 27(a), account information may now be reported as it applies going forward since payments are being made by this borrower. • Discharged – If the bankruptcy for Borrower 1 is discharged, report CII = E. Discontinue reporting Borrower 1 on subsequent updates. Continue reporting for Borrower 2 according to FAQ 27(a). • Dismissed = If the bankruptcy for Borrower 1 is dismissed, report CII = I. Continue reporting the account according to FAQ 27(b) since Borrower 1 is now a non-filer.
C	Both borrowers file Bankruptcy Chapter 13 in the same reporting period.	Follow FAQ 28(a).

FAQ 30 continued on next page

Frequently Asked Questions and Answers

FAQ 30 (continued)

D	<p>Borrower 1 files Bankruptcy Chapter 13 – Borrower 2 is a non-filer. At a later time, Borrower 2 files Bankruptcy Chapter 13.</p>	<p>When Borrower 1 files BK Chapter 13, follow FAQ 28(b) because at this time, there is also a non-filer on this account. As per the FAQ, the non-filer should be terminated from the account using ECOA Code T.</p> <p>When Borrower 2 files BK Chapter 13, in order to reflect a different repayment plan, re-report this borrower in a separate account with a modified Consumer Account Number. Since the account history is already on file with the terminated account, do not include account history on this second account. For Borrower 2, report:</p> <ul style="list-style-type: none"> • Consumer Information Indicator = D • ECOA Code = applicable value such as 2 (not T) • Consumer Account Number = modified number • Date Opened = original date opened • Account Status = same Account Status as of Borrower 1's bankruptcy petition • Current Balance = actual account balance • Date of Account Information = current month's date <p>When Borrower 2's plan is confirmed, report this second account as per FAQ 28(a).</p> <p>When Borrower 1 completes the BK Chapter 13 plan, report CII = H for Borrower 1. Discontinue reporting Borrower 1 and this account on subsequent updates.</p> <p>When Borrower 2 completes the BK Chapter 13 plan, report CII = H for Borrower 2. If all payments have been completed according to the plan and there is no further obligation, discontinue reporting the account on subsequent updates. However, if all payments have been completed according to the plans and the account is a Secured Debt that is still open, both borrowers may be reported with CII = Q to remove the BK indicators so that ongoing payments made by the consumers may be reported.</p>
----------	-------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FAQ 30 continued on next page

Frequently Asked Questions and Answers

FAQ 30 (continued)

<p>E</p>	<p>Borrower 1 files Bankruptcy Chapter 7 and Borrower 2 files Bankruptcy Chapter 13 in the same reporting period.</p>	<p>In the month the BK's were filed, Borrower 1 should be reported with CII = A, and Borrower 2 should be reported with CII = D. (Each borrower may be protected by an automatic stay based on his or her bankruptcy filing.)</p> <ul style="list-style-type: none"> • Account Status = status at the time of petition • Payment History = first character based on previous month's Account Status, plus prior history • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>Months between petition filed and BK resolution:</p> <ul style="list-style-type: none"> • CII = Blank (previous values reported are retained) or CII = A for Borrower 1 and CII = D for Borrower 2 • Payment History = increment first position with value 'D' (plus history reported prior to bankruptcy) • Current Balance = outstanding balance amount • Scheduled Monthly Payment Amount = contractual monthly payment amount • Amount Past Due = dependent on status • Date of Account Information = current month's date <p>In subsequent months:</p> <p><u>Borrower 1:</u></p> <p>Debt is Discharged:</p> <ul style="list-style-type: none"> • CII = E (Discharged through BK Chapter 7) • Discontinue reporting Borrower 1 on subsequent updates. <p>Note: In this case, begin to follow FAQ 28(a) because at this point, Borrower 2 is the only borrower remaining on the account.</p> <p><i>Scenario E continued on next page</i></p>
-----------------	-----------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FAQ 30 continued on next page

Frequently Asked Questions and Answers

FAQ 30 (continued)

<p>E</p>	<p><i>Continued from previous page</i></p> <p>Borrower 1 files Bankruptcy Chapter 7 and Borrower 2 files Bankruptcy Chapter 13 in the same reporting period.</p>	<p><u>Borrower 1:</u> BK is Dismissed:</p> <ul style="list-style-type: none"> • CII = I (Dismissed through BK Chapter 7) • ECOA Code = T (Terminated) if the BK Chapter 13 for Borrower 2 is still in petition or confirmed state. <p>Note that Borrower 1 may now be protected by the automatic stay of Borrower 2's BK Chapter 13.</p> <p>Continue to follow FAQ 28(b) because at this point, there is a filer and non-filer on the account.</p> <p><u>Borrower 2:</u> BK Dismissed:</p> <ul style="list-style-type: none"> • CII = L (BK Chapter 13 dismissed) <p>Continue reporting and follow FAQ 27(b) if the BK for Borrower 1 is still a Chapter 7 petition or discharge.</p>
<p>F</p>	<p>Borrower 1 files Bankruptcy Chapter 7 – Borrower 2 is a non-filer. At a later time, Borrower 2 files Bankruptcy Chapter 13.</p>	<p>When Borrower 1 files BK Chapter 7, follow FAQ 27(b) because at this point, there is also a non-filer on this account. Therefore, for the account level fields, report account information for the consumer who did <u>not</u> file the bankruptcy.</p> <p>When Borrower 2 files BK Chapter 13 at a later date, follow FAQ 28(a) because Borrower 1 is no longer reported after the BK Chapter 7 discharge. At this point, report the Account Status at the time of the BK Chapter 13 petition.</p> <p>If the BK Chapter 7 for Borrower 1 is dismissed, report CII = I and ECOA Code T to terminate this borrower from the account. At this point, Borrower 1 may be protected by the automatic stay of Borrower 2's BK Chapter 13. Continue to follow the guidance in FAQ 28(b).</p>

FAQ 30 continued on next page

Frequently Asked Questions and Answers

FAQ 30 (continued)

G	Borrower 1 files Bankruptcy Chapter 13 – Borrower 2 is a non-filer. At a later time, Borrower 2 files Bankruptcy Chapter 7.	<p>When the first borrower files BK Chapter 13, follow FAQ 28(b) because at this point, there is also a non-filer on this account. As per the FAQ, the non-filer (Borrower 2) should be terminated from the account using ECOA Code T.</p> <p>When Borrower 2 files BK Chapter 7, re-report this borrower with the original ECOA Code (not T) and CII = A (Petition for Chapter 7 BK). Follow the guidance in FAQ 28(a) for this account.</p> <p>If Borrower 2's BK is dismissed, report CII = I (Chapter 7 BK Dismissed) and ECOA Code T (Terminated) since this borrower may be protected by Borrower 1's Chapter 13 BK.</p> <p>If Borrower 2's BK is discharged, report CII = E (Chapter 7 BK Discharged). Discontinue reporting this consumer on subsequent updates and continue reporting the account and Borrower 1 following FAQ 28(a).</p>
----------	-----------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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.

Frequently Asked Questions and Answers

32. Question: How should an account be reported when a Bankruptcy case has been closed or terminated without being discharged or dismissed?

Answer: Report Consumer Information Indicator **Q** to remove the previously-reported Bankruptcy Petition indicator. If the case is re-opened, report the Consumer Information Indicator for the appropriate disposition; e.g., petition, discharged or dismissed.

Note: A bankruptcy case may be closed or terminated when the consumer does not pay the applicable court fees or does not attend the required financial management class.

Frequently Asked Questions and Answers

REPORTING SCENARIOS

Please note that within these reporting guidelines, certain fields are mentioned that provide specific guidance for the situations described. For all other Metro 2® fields, the standard guidelines described within the Field Definitions module should be followed.

33. 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
- Credit Limit = assigned credit limit
- Highest Credit or Original Loan Amount = highest balance ever attained when the overdraft protection was used

34. Questions: Charge-offs:

(a) How should charged off accounts be reported?

Answer: Report the following Base Segment fields:

- Scheduled Monthly Payment Amount = zero
- Account Status = 97 (Unpaid balance reported as a loss – charge-off)
- Current Balance and Amount Past Due = outstanding balance amount, which may include fees and interest. If payments are made by the consumer, report the declining balance in these two fields.
- Original Charge-off Amount = the original amount charged to loss, regardless of the declining balance. This field should not be changed.
- FCRA Compliance/Date of First Delinquency = the date of the first delinquency that led to the account being charged off
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), zero fill. For Revolving, Open and Line of Credit accounts (Portfolio Types R, O and C), if the account is closed, report the date the account was closed to further purchases. Otherwise, zero fill.
- Date of Last Payment = date of the consumer's most recent payment

Note: If the deficiency balance is being charged off for accounting and general ledger purposes only, **do not report** the account as a charge off. Deduct the charged off amount from the Current Balance of the ongoing account.

FAQ 34 continued on next page

Frequently Asked Questions and Answers

34(b) How should paid charge-off accounts be reported?

Answer: Report the following Base Segment fields:

- Scheduled Monthly Payment Amount = zero
- Account Status = 64 (Account paid in full, was a charge-off)
- Special Comment Code = If the account is settled for less than the full balance, include **AU**.
- Current Balance and Amount Past Due = zero
- Original Charge-off Amount = the original amount charged to loss
- Date of Account Information = date paid
- FCRA Compliance/Date of First Delinquency = the date of the first delinquency that led to the account being charged off
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), report the date the account was paid in full. For Revolving, Open and Line of Credit accounts (Portfolio Types R, O and C), report the date the account was closed to further purchases.
- Date of Last Payment = date of the consumer's most recent payment

34(c) Is there a preferred method of reporting when an account is partially charged off?

Answer: When the consumer is held responsible for the portion of the debt that is charged off, follow the guidance below.

Note: If the deficiency balance is being charged off for accounting and general ledger purposes only, **do not report** the charge off as a separate account as described below. Deduct the charged off amount from the Current Balance of the ongoing account.

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 original 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

- 35. Question: If a credit card or account is in dispute or temporarily unavailable for use because the credit grantor is conducting an investigation (due to a request from the consumer, such as potential identity theft or other reason), how should the account be reported?**

Answer: Continue to report the account as usual, but include Compliance Condition Code **XB**, which specifies "Account information disputed by consumer under the Fair Credit Reporting Act".

When the investigation is complete, if the account is valid for this consumer (i.e., not fraudulent), continue to report the account as usual. If any months of the payment history are invalid, use the Payment History Profile (Base Segment Field 18) to correct the history for those months. In addition, report Compliance Condition Code **XR** to remove the previously-reported **XB** or report Compliance Condition Code **XH**, which specifies "Account previously in dispute – investigation completed, reported by data furnisher".

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.

Note: If the consumer has submitted an identity theft report to you, certain obligations occur. Refer to the Fair Credit Reporting Act section 623(a)(6).

- 36. 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.

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.

When all outstanding charges have been paid in full, report Account Status Code **13** or **62**, as applicable.

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).

Frequently Asked Questions and Answers

37. Question: How should an account be reported when an auto lease is prepaid – where entire lease payment is paid at the time of opening?

Answer: Report Account Type **3A** (Auto Lease) and Special Comment Code **BS** (Prepaid Lease). Even though the account has been prepaid, do not report the Account Status as paid since the potential exists for lease end charges to be due on termination. Report the account as current (Account Status Code 11) while the lease is open.

If lease end charges apply, do not change the Original Loan Amount, but add the lease end charges to the Current Balance and, if appropriate, to the Amount Past Due. Report the Account Status Code that accurately describes how the lease end charges are being paid.

When all lease end charges have been paid in full, after termination, report the appropriate paid Account Status Code.

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).

38. Question: How should accounts that are paid in full for less than the full balance (i.e., settled) be reported?

Answer: Report the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- 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
- Date of Account Information = the date the account was paid in full for less than the full balance
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), report the date the account was paid in full for less than the full balance. For Revolving and Line of Credit accounts (Portfolio Types R and C), report the date the account was closed to further charges. For Open accounts (Portfolio Type O), report the date the account was closed to further charges or paid in full, as applicable.

Frequently Asked Questions and Answers

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

Answer: Report the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Actual Payment Amount = the amount actually received for this reporting period
- Credit Limit = For Revolving, Open and Line of Credit accounts, report the last assigned credit limit.
- 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 Code = M or CI may be reported if applicable for Revolving, Open and Line of Credit accounts
- **OR** Compliance Condition Code = XA may be reported if applicable for Revolving, Open and Line of Credit accounts.

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

- Current Balance and Amount Past Due = zero
- Date of Account Information = Report the date the account was paid in full. For inactive accounts, report a date within the current reporting period when the account was closed to further use.
- Date Closed = For Installment and Mortgage accounts (Portfolio Types I and M), report the date the account was paid in full. For Revolving and Line of Credit accounts (Portfolio Types R and C), report the date the account was closed to further charges. For Open accounts (Portfolio Type O), report the date the account was closed to further charges or paid in full, as applicable.

Frequently Asked Questions and Answers

40. 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
- Credit Limit = report last assigned credit limit
- Account Status Code = 11, 71, 78, 80, 82-84, 93 or 97, as applicable
- Special Comment Code = M, if account closed by credit grantor
- **OR** Compliance Condition Code = if account closed at consumer's request, report the appropriate code XA, XD, XE or XJ

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

- 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

41. 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 Account Status, Payment Rating, 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

42. Question: How should a renegotiated/refinanced loan be reported?

Answer: The guidelines described below are used for renegotiated or refinanced loans that are **not** associated with one of the federal loan modification programs. 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.

Optional: Special Comment Code **CO** (Loan modified) may be reported. Note that this code is used when reporting accounts that are modified, but not under a federal government plan.

Special Comment **CO** may be reported as long as deemed appropriate by the data furnisher, or until another Special Comment becomes more critical. For the length of time the Special Comment should be reported, consult with your internal Legal or Compliance department.

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 original Account Number and Date Opened change, report the original 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 Account Number, 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.

Note: For reporting guidelines specific to the federal loan modification programs, such as Making Home Affordable, Hope for Homeowners and the Fannie Mae/Freddie Mac Mortgage Loan Modification Program, refer to the module called "Mortgage Loan Modifications".

Frequently Asked Questions and Answers

43. Question: Lost or Stolen Credit Cards:

(a) How should a lost or stolen credit card be reported when the consumer will retain the account, but will get a new Account Number?

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. Continue to report the original Date Opened.

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 = 09/15/2015
Account History = Always current
Unknown Months of History = July and August 2015
Payment History Profile = DD0000000000000000000000

2. Report Special Comment Code **BL** (Credit card lost or stolen), the appropriate Account Status Code and Current Balance of zero. 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 = 09/15/2015
Account History = Always current
Unknown Months of History = July and August 2015
Payment History Profile = DD0000000000000000000000

In the following month's reporting period, 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.

Note: Payment history that occurred prior to the credit card being lost or stolen should **not** be reported under the new Account Number.

FAQ 43 continued on next page

Frequently Asked Questions and Answers

FAQ 43 (continued)

(b) How should a lost or stolen credit card be reported when the consumer does not want a replacement card and will pay off the existing account?

Answer: Continue reporting the account normally. Do **not** report Special Comment BL. Report Compliance Condition Code XA to denote 'Account closed at consumer's request'. When the Current Balance Amount reaches zero, report Account Status Code 13 and the applicable Payment Rating, along with Compliance Condition Code XA.

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 = 09/15/2015

Account History = Always current

Unknown Months of History = July and August 2015

Payment History Profile = DD0000000000000000000000

Frequently Asked Questions and Answers

44. Question: How should deferred loans be reported?

Answer: Report the following Base Segment fields as specified:

- Terms Duration = blank
- Terms Frequency = D (Deferred)
- Highest Credit or Original Loan Amount = the total amount borrowed, excluding interest
- Scheduled Monthly Payment Amount = zero
- Account Status Code = 11 (Current account)
- 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.
- Current Balance = the total amount borrowed minus any payments which have been made
- Amount Past Due = zero

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.

Important Note: When the account goes into repayment, stop reporting the K4 Segment and begin reporting monthly payment information. Report valid values as per the repayment agreement in the following fields:

- Terms Duration
- Terms Frequency (other than **D**)
- Scheduled Monthly Payment Amount

Frequently Asked Questions and Answers

45. Question: How should accounts in forbearance be reported?

Answer: Forbearance is a period of time during repayment in which a borrower is permitted to temporarily postpone making regular monthly payments. The debt is not forgiven, but regular payments are suspended until a later time. As an example, forbearance may be granted if a borrower is experiencing temporary financial difficulty. The consumer may be making reduced payments, interest-only payments or no payments.

If the account is in forbearance, report:

- Terms Duration = terms of the loan, which can be changed if the terms of the loan are extended
- Terms Frequency = frequency for payments due
(If no payments are due during the forbearance time period, report code **D** for deferred.)
- Scheduled Monthly Payment Amount = new payment due
(If no payments are due during the forbearance time period, zero fill.)
- Account Status = appropriate code that specifies the status of the account for each month the account is in forbearance (e.g., Current, 30 days delinquent, 60 days delinquent)
(If no payments are due during the forbearance time period, report Account Status **11**.)
- Payment History Profile = appropriate code that specifies the previous month's Account Status for each month the account is in forbearance, plus prior history
(Increment the Payment History Profile with value **D** if no payments are due during the forbearance time period.)
- Special Comment Code = **CP** (Account in forbearance)
- Current Balance = outstanding current balance, reflecting any payments made
- Amount Past Due = outstanding past due amount, if the account is delinquent during the forbearance time period
- K4 Specialized Payment Indicator = **02** and Deferred Payment Start Date
(If payments are deferred during the forbearance time period)

NOTE: A forbearance agreement is most commonly applied to mortgages and student loans. However, forbearance is applicable to any type of loan.

Frequently Asked Questions and Answers

46. Question: How should accounts that have been transferred be reported?

Answer: There are two options for reporting accounts that are being transferred internally or to a servicer:

1. **Preferred Option if account history can be verified by the new department or servicer:** Report the L1 Segment to change the Identification Number and/or the Consumer Account Number. Use of the L1 Segment allows the consumer reporting agencies to retain all prior account history.
2. The second option results in two tradelines on a consumer's file: the first as transferred and the second for the ongoing account.

Report the following Base Segment fields as specified for the transferred account:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = the appropriate code that specifies the status of the account at the time of transfer
- Payment Rating = if applicable to the Account Status Code being reported
- Special Comment = For internal transfers, report Special Comment AT (Account closed due to transfer) **or** for transfers to another company or servicer, report Special Comment O (Account transferred to another company/servicer).
- Current Balance and Amount Past Due = zero
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of transfer, report the date of the first delinquency
- Date Closed = date the account was transferred

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 transferred to the internal department or servicer that will be reporting the ongoing account.

FAQ 46 continued on next page

Frequently Asked Questions and Answers

FAQ 46 (Option 2 continued)

In the following month's reporting period, report the following Base Segment fields as specified for the new account:

- Identification Number = number that identifies the new department or servicer reporting the account
- Consumer Account Number = new account number for the ongoing account
- Date Opened = date opened with the original department or servicer
- Account Status Code = appropriate code that specifies the status of the account as of the Date of Account Information
- Payment Rating = if applicable to the Account Status Code being reported
- Payment History Profile = report character 'B' for months the account was reported by the original department or servicer; do **not** report payment history that occurred prior to the transfer.
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of transfer, report the date of first delinquency **with the original department or servicer** that led to the status being reported.

If the new department or servicer is unable to obtain the **Date of First Delinquency with the original department or servicer**, do not report the account.

Note: If accounts are being transferred from one data processor to another, contact the data representative at each consumer reporting agency to facilitate transfer of the accounts.

Frequently Asked Questions and Answers

47. Question: How should accounts that have been sold to another company be reported?

Answer: Prior to reporting accounts that have been sold to another company, it is imperative that the data representative at each consumer reporting agency be contacted to discuss the various options and to facilitate a smooth transition. There are two options for reporting accounts that are sold to another company.

1. If the company that purchased the accounts will not report the prior history, the seller must report the accounts as sold to reflect the final status.

Report the following Base and K2 Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = the appropriate code that specifies the status of the account at the time of the sale
- Payment Rating = if applicable to the Account Status Code being reported
- Special Comment = AH (Purchased by another company)
- 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 company. If the account was closed prior to being sold, report the original date the account was closed.
- K2 Segment Portfolio Indicator = 2 and Sold To Name = name of company to which the account was sold

Notes: To minimize consumer disputes, do not report accounts as sold that were previously reported as paid in full.

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**.

2. If the company that purchased the accounts is converting the account history to their system, the seller should **not** report the accounts as sold.

In this situation, the seller and purchaser should work together with the data representatives at the consumer reporting agencies, who will assist you with conversion of the accounts.

Frequently Asked Questions and Answers

48. Question: How should accounts that have been purchased from another company be reported?

Answer: Prior to reporting portfolio acquisitions, it is imperative that the data rep at each consumer reporting agency be contacted to discuss the various reporting options and to facilitate a smooth transition. Two possible options for reporting are:

1. If the lender who sold the accounts reported them as "account transferred to another company" or the history cannot be verified for the account prior to purchase, report the following Base and K2 Segment fields as specified:

- Consumer Account Number = newly assigned account number
- Date Opened = date opened with the previous lender (**preferred**).
Note: If the date opened with the previous lender is not known, the date the account was purchased may be reported.
- Account Status Code = appropriate code that specifies the status of the account as of the Date of Account Information
- Payment Rating = if applicable to the Account Status Code being reported
- Payment History Profile = report character **B** for months when account was owned by the previous lender
- Date of Account Information = follow the standard guidelines documented in Field 24
Note: Reporting by the purchaser should begin in the following month's reporting period – **after** the seller reported the accounts as sold.
- FCRA Compliance/Date of First Delinquency = if the account is delinquent or derogatory at the time of purchase, report the date of the first delinquency with the previous lender

Note: If the new lender is unable to obtain the **Date of First Delinquency with the original lender**, do not report the account.

- K2 Segment Portfolio Indicator = **1** and Purchased Portfolio Name = name of the company from which the account was purchased

Important Notes: Payment history that occurred with the previous lender, which is already on the consumer's file, must not be reported by the new lender.

Do not report purchased accounts that were included in discharged/completed Bankruptcies.

FAQ 48 continued on next page

Frequently Asked Questions and Answers

FAQ 48 (continued)

2. If the previous lender's account history is being converted to the new lender's system and the account history can be verified, report the following Base, K2 Segment and L1 Segment fields as specified:
- Base Segment Identification Number = Identification Number reported by the previous lender
 - Base Segment Consumer Account Number = Account Number reported by the previous lender
 - Date Opened = date opened with the previous lender
 - Account Status Code = appropriate code that specifies the status of the account as of the Date of Account Information
 - Payment Rating = if applicable to the Account Status Code being reported
 - Payment History Profile = report payment history provided by the previous lender
 - Date of Account Information = follow the standard guidelines documented in Field 24
- Note:** Reporting by the purchaser should begin in the following month's reporting period – **after** the seller reported the accounts as sold.
- FCRA Compliance/Date of First Delinquency = if the account is delinquent or derogatory at the time of purchase, report the date of the first delinquency with the previous lender

Note: If the new lender is unable to obtain the ***Date of First Delinquency with the original lender***, do not report the account.

- K2 Segment Portfolio Indicator = **1** and Purchased Portfolio Name = name of the company from which the account was purchased
- L1 Segment Change Indicator = **3**, New Consumer Account Number = new account number assigned by the new lender, and New Identification Number = internal code that specifies where information will be verified by the new lender

Note: Do not report purchased accounts that were included in discharged/completed Bankruptcies.

Frequently Asked Questions and Answers

49. 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.

50. 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

51. Question: How should credit cards with no preset spending limits be reported that have terms allowing consumers to exceed the credit limits (i.e., Flexible Spending Credit Cards)?

Answer: Report the following Base Segment fields as specified:

- Account Type Code = 0G (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 if due in full, OR the minimum due based on the total outstanding balance
- 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 1 –

Flexible Spending Credit Cards with both Revolving and Open Terms:

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.

Example 2 –

Flexible Spending Credit Cards with only Revolving Terms:

A consumer has a credit card with a \$10,000 credit limit. Additionally, the consumer has no preset spending limit and can exceed the credit limit with no penalties or added fees. The minimum amount due is calculated as a percentage of the total balance amount. The current balance is \$12,000 and the percentage due is 3%. The Scheduled Monthly Payment Amount is \$360.

Frequently Asked Questions and Answers

52. 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, Account Status Code 82 represents 120 – 149 days past the due date or Account Status Code 84 represents 180 days or more past the due date.

Foreclosure Started – Special Comment Code **BO** should be reported, 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 Account Status Code 82 for 120 – 149 days past the due date.

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.

Foreclosure Started / Now Paid – Account Status Code **65** should be reported when foreclosure proceedings had been started, but the consumer subsequently paid the account balance in full. Account Status 65 specifies "Account paid in full. A foreclosure was started". The appropriate Payment Rating should be reported in conjunction with this Account Status.

Foreclosure Completed – Account Status Code **94** should be reported, which specifies "Foreclosure completed; there may be a balance due". The appropriate Payment Rating should be reported in conjunction with this Account Status. Discontinue reporting Special Comment Code **BO** (Foreclosure proceedings started) at this point.

If the consumer is not responsible for the remaining balance on the account, report Account Status 94 and a Current Balance of zero. Report the Date Closed as the date the foreclosure was completed.

If the consumer is held responsible for the remaining balance on the account, continue reporting Account Status 94. Report the remaining balance in the Current Balance field, and as payments are made by the consumer, report a declining balance. When the Current Balance reaches zero, report the Date Closed as the date the account was paid in full.

For credit reporting purposes, do **not** report Account Status Code 97 (Charge-off) after Account Status 94 has been reported.

FAQ 52 continued on next page

Frequently Asked Questions and Answers

FAQ 52 (continued)

Redeemed Foreclosure – Account Status 65 should be reported, which specifies “Account paid in full. A foreclosure was started”. The appropriate Payment Rating should be reported in conjunction with this Account Status, along with a Current Balance and Amount Past Due = zero.

Note: Each state has a rescission period that allows the consumer to redeem the property during or after foreclosure.

Frequently Asked Questions and Answers

53. Question: How should alternatives to foreclosure (i.e., Deed in Lieu and Short Sale) be reported?

Answer: Use the following guidelines:

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

If the consumer is not responsible for the remaining balance on the account, report Account Status Code 89 and a Current Balance of zero. Report the Date Closed as the date the deed was received in lieu of foreclosure.

If the consumer is held responsible for the remaining balance on the account, continue reporting Account Status 89. Report the remaining balance in the Current Balance field, and as payments are made by the consumer, report a declining balance. When the Current Balance reaches zero, report the Date Closed as the date the account was paid in full. Note that the Payment History Profile field should contain 24 months of history the first time Account Status Code 89 is reported. In subsequent months, when Account Status 89 is reported, the entire Payment History Profile should be blank filled.

For credit reporting purposes, do **not** report Account Status Code 97 (Charge-off) after Account Status 89 has been reported.

Short Sale – A short sale occurs when the proceeds from the sale of real estate fall short of the balance owed on the loan. In a short sale, the lender agrees to discount the loan balance typically due to an economic or financial hardship on the part of the consumer.

Report the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Actual Payment Amount = the amount actually received for this reporting period
- Account Status Code = 13 (Paid or closed account/zero balance) or 65 (Account paid in full, a foreclosure was started), as applicable
- Payment Rating = applicable code that identifies whether the account is current or past due within the activity period being reported
- Special Comment = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero
- Date of Account Information = the date the account was paid in full for less than the full balance
- Date Closed = the date the account was paid in full for less than the full balance

Frequently Asked Questions and Answers

54. Question: How should a secured account (i.e., mortgage, home equity or other secured account) be reported when the collateral is released but there is an outstanding balance due?

Answer: Continue to report the existing account with the following Base Segment fields as specified:

- Portfolio Type & Account Type = remain the same as previously reported
- Date Opened = the date the account was originally opened
- Original Loan Amount = the original amount of the loan
- Terms Duration = terms of the loan, which can be changed if the terms of the loan are extended
- Scheduled Monthly Payment Amount = new scheduled payment due
- Account Status Code = the applicable code that specifies how the consumer is paying the deficiency balance, such as current or delinquent
- Special Comment = CM (Collateral released by creditor/balance owing)
- Current Balance = outstanding balance owed, which may decline as payments are made
- Amount Past Due = outstanding past due amount, if the account is delinquent

Note: When the consumer pays the outstanding balance in full, report the applicable "paid" Account Status Code, as well as the Payment Rating, if required. Discontinue reporting Special Comment CM. The Current Balance and Amount Past Due should be zero.

Frequently Asked Questions and Answers

55. Question: How should full loan assumptions be reported?

Answer: There are two options for reporting.

1. If the Consumer Account Number remains the same for the consumer who is assuming the loan, the **consumers must be reported in separate reporting periods**.
 - The first month, report the original consumer(s) with ECOA Code **T** (Terminated) and Special Comment Code **H** (Loan assumed by another party). Report the Current Balance as zero.
 - The following month, report the new consumer(s). The Date Opened should be the date the loan was assumed by the new consumer(s). Other account information should be changed, if appropriate. For example, Terms Duration, Scheduled Monthly Payment, Current Balance or other fields may be different for the new consumer(s). Do **not** report the original consumer's account history in the Payment History Profile (Field 18).
2. If the consumer who is assuming the loan is given a new Consumer Account Number, follow these guidelines:
 - Report the original consumer(s) with ECOA Code **T** (Terminated) and Special Comment Code **H** (loan assumed by another party). Report the Current Balance as zero.
 - Report the new consumer(s) during the same month with the new Consumer Account Number, the Date Opened as the date the loan was assumed, and other appropriate account information. Do **not** report the original consumer's account history in the Payment History Profile (Field 18).

Frequently Asked Questions and Answers

56. Question: How should simple loan assumptions be reported?

Answer: A simple loan assumption is one in which the original borrower remains responsible for the loan in the event that the new borrower defaults.

Report the original loan for the original borrower with the following Base Segment fields as specified:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = applicable code that specifies the status of the account prior to the assumption
- Special Comment Code = AT (Account closed due to transfer)
- Current Balance and Amount Past Due = zero
- FCRA Compliance/Date of First Delinquency = if the account is delinquent at the time of the assumption, report the date of the first delinquency
- Date Closed = date the assumption process was completed

Report the assumed loan for the original and new borrower(s) with the following Base, J1 or J2 Segment fields as specified:

- Consumer Account Number = new or modified Account Number
Note: If the Account Number for the assumed loan remains the same, it must be modified for credit reporting purposes in order to be unique. For example, add a digit or character to the end of the original number.
- Date Opened = date the loan was assumed
- Highest Credit or Original Loan Amount = the amount that was assumed by the new borrower(s)
- Terms Duration/Terms Frequency/Scheduled Monthly Payment Amount = as applicable for the assumed loan
- Account Status Code = 11 (Current Account) for the first reporting period after the assumption. In subsequent reporting periods, the applicable code that specifies the status of the account as of the Date of Account Information.
- Payment History Profile = 'B' filled for the first reporting period after the assumption.
Note: Payment history that occurred prior to the assumption must not be reported on the assumed loan.
- ECOA Code for new borrower(s) = 7 (Maker)
- ECOA Code for original borrower = 5 (Guarantor)

57. Question: How should reverse mortgages be reported?

Answer: Do not report reverse mortgages because the consumer has no credit obligation.

Frequently Asked Questions and Answers

58. Question: How should an account be reported when the consumer is affected by a natural or declared disaster?

Answer: Use the following reporting guidelines, which apply to the trade and/or collection account level.

Open Accounts – defined as Account Status Code 11 (Current account) or 71, 78, 80, 82, 83 or 84 (Delinquent accounts).

There are three options for reporting:

1. Report the Account Status **that applies to the account** (credit grantor's decision). Report Special Comment **AW** (Affected by natural or declared disaster).
2. Report Account Status **11** (Current account) and Special Comment **AW** (Affected by natural or declared disaster).
3. Report the account as deferred, along with Special Comment **AW** (Affected by natural or declared disaster).

Report the following Base Segment fields as specified:

- Terms Duration = blank
- Terms Frequency = D (Deferred)
Required for deferred accounts
- Highest Credit or Original Loan Amount = the total amount borrowed
- Scheduled Monthly Payment Amount = zero
- Account Status Code = 11 (Current account)
- Payment History Profile = Use Character **D** for the months where payments are deferred.
- Current Balance = the total amount borrowed minus any payments which have been made
- Amount Past Due = zero

If the Deferred Payment Start Date is known, report the K4 Segment with Specialized Payment Indicator **02** for Deferred Payment. Also, report the **Deferred Payment Start Date** as the date the first payment will be due. If the deferred payment start date is not known, do not report the K4 Segment.

Closed Accounts with Balances Owning

Follow the same three options as described above for Open Accounts.

FAQ 58 continued on next page

Frequently Asked Questions and Answers

FAQ 58 (continued)

Derogatory Accounts – defined as Account Status Codes 88 (Government Claim), 89 (Deed in Lieu), 93 (Collection), 94 (Foreclosure Completed), 95 (Voluntary Surrender), 96 (Repossession), and 97 (Charge-off).

Continue reporting these statuses and add Special Comment **AW** (Affected by natural or declared disaster).

Debt Buyers and Collection Agencies

Continue reporting Account Status Code 93 (Collection) and add Special Comment **AW** (Affected by natural or declared disaster).

If accounts are sold to another company or given back to the original creditor, report Account Status Code **DA** to delete the accounts.

59. Question: How should deposit accounts, with overdraft protection, be reported that have been overdrawn?

Answer: These deposit accounts should only be reported when they are charged off or in collection activity. Report the following Base Segment fields as specified.

- Portfolio Type = O (Open)
- Account Type Code = 8B (Deposit Account with Overdraft Protection)
- Date Opened = date account opened
- Credit Limit = assigned overdraft limit
- Highest Credit/Original Loan Amount = highest overdrawn amount
- Terms Duration = 001
- Scheduled Monthly Payment Amount = zero fill
- Account Status Code = 93 (Collection), 97 (Unpaid balance reported as a loss – charge-off), 62 (Paid collection) or 64 (Account paid in full, was a charge-off)
- Current Balance = total amount currently owed
- Amount Past Due = total amount currently past due
- Date of First Delinquency = date account was first overdrawn
- Date Closed = date the account was closed

60. Question: How should prepaid credit cards/gift cards be reported?

Answer: Do not report prepaid credit cards/gift cards because the consumer has no credit obligation.

Frequently Asked Questions and Answers

61. Question: How should an account be reported when it is included in a Personal Receivership plan (Wisconsin Chapter 128)?

Answer: Report the account per existing Metro 2[®] guidelines. If the Terms Duration and Scheduled Monthly Payment Amount were modified by the plan, report the new values. Include Consumer Information Indicator **1A** (Personal Receivership) for the consumer who filed the plan.

When the plan is completed or has been dismissed, report Consumer Information Indicator **Q** to remove the Personal Receivership indicator.

Frequently Asked Questions and Answers

62. Question: How should an account be reported when merchandise has been repossessed or the consumer has voluntarily surrendered the merchandise?

Answer: Use the following guidelines:

Repossession – Account Status Code **96** should be reported, which specifies “Merchandise was repossessed; there may be a balance due”.

If the consumer is not responsible for the remaining balance on the account, report a Current Balance of zero. Report the Date Closed as the date the merchandise was repossessed.

If the consumer is held responsible for the remaining balance on the account, report that amount in the Current Balance field. As payments are made by the consumer, report a declining balance. When the consumer pays the outstanding balance in full, report Account Status Code **63**, which specifies “Account paid in full, was a repossession”. The Current Balance and Amount Past Due should be zero and the Date Closed should be the date the account was paid in full.

If the remaining balance is not paid and is subsequently charged off, report Account Status Code 97 (Unpaid balance reported as a loss – charge-off). In subsequent reporting periods, follow FAQ 34.

Voluntary Surrender – Account Status Code **95** should be reported, which specifies “Voluntary Surrender; there may be a balance due”, along with the applicable Payment Rating.

If the consumer is not responsible for the remaining balance on the account, report a Current Balance of zero. Report the Date Closed as the date the consumer voluntarily surrendered the merchandise.

If the consumer is held responsible for the remaining balance on the account, report that amount in the Current Balance field. As payments are made by the consumer, report a declining balance. When the consumer pays the outstanding balance in full, report Account Status Code **61**, which specifies “Account paid in full, was a voluntary surrender”. The Current Balance and Amount Past Due should be zero and the Date Closed should be the date the account was paid in full.

If the remaining balance is not paid and is subsequently charged off, report Account Status Code 97 (Unpaid balance reported as a loss – charge-off). In subsequent reporting periods, follow FAQ 34.

Frequently Asked Questions and Answers

63. Question: How should a replacement credit card be reported (i.e., credit card replaced with a new account number)?

Answer: There are two options for reporting replacement credit cards:

1. **Preferred Option:** Report the L1 Segment to change the Consumer Account Number. Use of the L1 Segment allows the consumer reporting agencies to retain all prior account history and maintain one account.
2. The second option results in two tradelines on a consumer's file: the first as transferred and the second for the ongoing account.

Report the following Base Segment fields as specified for the transferred account:

- Scheduled Monthly Payment Amount = zero
- Account Status Code = the appropriate code that specifies the status of the account at the time of transfer
- Special Comment = AT (Account closed due to transfer)
- Current Balance and Amount Past Due = zero
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time of transfer, report the date of the first delinquency that led to the status being reported.
- Date Closed = date the account was transferred

In the following month's reporting period, report the new account with the new account number. Report the following Base Segment fields as specified for the new account with the new account number:

- Date Opened = date the original account was opened
- Account Status Code = the status of the account for the current month
- Payment History Profile = Report character **B** for months the account was reported with the original account number; do **not** report payment history that occurred prior to the replacement card being issued.
- FCRA Compliance/Date of First Delinquency = If the account is delinquent or derogatory at the time the card is replaced, report the date of the first delinquency that led to the status being reported.

Frequently Asked Questions and Answers

64. Question: How should an account be reported when the creditor files a Form 1099-C (Cancellation of Debt) with the IRS?

Answer: It is the creditor's business decision whether to report the account as charged off or, if a settlement agreement was made with the consumer, report the account as settled. A special comment for IRS 1099-C filings is not available for reporting.

If the account is reported as a charge off, report the following Base Segment fields:

- Account Status Code = 97 (Unpaid balance reported as a loss – charge-off)
 - Current Balance and Amount Past Due = zero
- Note:** These fields should be zero since the 1099-C represents a cancellation of the consumer's debt.
- Original Charge-off Amount = the original amount charged to loss
 - FCRA Compliance/Date of First Delinquency = the date of the first delinquency that led to the account being charged off

If the account is reported as settled, refer to FAQ 38 for reporting guidance.

Frequently Asked Questions and Answers

65. Question: How should timeshare mortgages and timeshare loans be reported?

Answer: If the timeshare account is a mortgage, report the account according to the Mortgage Portfolio Type guidelines. Report the following Base Segment fields as specified:

- Portfolio Type = M (Mortgage)
- Account Type Code = 26 (Conventional Mortgage) or 08 (Real Estate, specific type unknown), as applicable
- Terms Duration = number of years of the loan
- Account Status Code = 11, 13, 65, 71, 78, 80, 82-84, 89, 94, DA or DF, as applicable
- Payment Rating = applicable code when Account Status Code = 13, 65, 89 or 94
- Special Comment = Refer to Exhibit 6, Mortgage column, for applicable comments.
- Interest Type Indicator = F (fixed) or V (variable/adjustable)

If the timeshare account is a loan, report the account according to the Installment Portfolio Type guidelines. Report the following Base Segment fields as specified:

- Portfolio Type = I (Installment)
- Account Type Code = 0A (Timeshare)
- Terms Duration = number of months of the loan
- Account Status Code = 11, 13, 61-64, 71, 78, 80, 82-84, 93, 95-97, DA or DF, as applicable
- Payment Rating = applicable code when Account Status Code = 13 or 95
- Special Comment = Refer to Exhibit 6, Installment column, for applicable comments.

Glossary of Terms

Account Number Scrambling	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.
Alphanumeric	Describes a character set that includes both letters and numbers.
ASCII	An acronym for American Standard Code for Information Interchange. A code used by certain types of computers.
Authorized User	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.
Automatic Stay	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.
Bankruptcy Closed	A bankruptcy case may be closed or terminated when the consumer does not pay the applicable court fees or does not attend the required financial management class.
Bankruptcy Discharged	The judgment of the court that a person who has filed a Chapter 7, 11 or 12 petition be granted a bankruptcy. A Chapter 13 debtor is entitled to a discharge upon completion of all payments under the Chapter 13 plan.
Bankruptcy Dismissed	A Chapter 7, 11, 12 or 13 petition is terminated without the granting of a discharge by the U.S. Bankruptcy Court.
Bankruptcy Petition (Chapter 7)	An application made to the U.S. Bankruptcy Court requesting release from financial obligations due to a debtor's inability to pay his debts.
Bankruptcy Petition (Chapter 11)	An application made to the U.S. Bankruptcy Court requesting financial reorganization.

Glossary of Terms

Bankruptcy Petition (Chapter 12)	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.
Bankruptcy Petition (Chapter 13)	An application made to the U.S. Bankruptcy Court requesting adjustment for personal debts and the establishment of a repayment plan.
Bankruptcy Withdrawn	The petitioner has decided not to file bankruptcy and has taken back the petition.
Blocking	Combining two or more records into a block to increase the efficiency of computer input and output operations.
Byte	One alphanumeric character.
Chapter 128	See Personal Receivership.
Consumer	One who buys goods or services.
Consumer Data Industry Association (CDIA)	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.
Cycle Reporting	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 timely reporting of account statuses.
Debt Buyer	A company or individual who purchases accounts (generally non-performing debts) with the intent of collecting debts owed.
EBCDIC	An acronym for Extended Binary Coded Decimal Interchange Code. A code used by certain types of computers.

Glossary of Terms

ECOA (Equal Credit Opportunity Act)

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.

ECOA Code

An alpha or numeric code used to describe a borrower's association with an account, according to the Equal Credit Opportunity Act (ECOA).

Factoring Company

See Debt Buyer.

FCBA (Fair Credit Billing Act)

A federal law stipulating procedures to help consumers resolve credit billing disputes with the credit grantor promptly and fairly. Disputes must be reported. The FCBA applies to open-end credit accounts, such as credit cards and revolving charge accounts.

FCRA (Fair Credit Reporting Act)

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.

FDCPA (Fair Debt Collection Practices Act)

The FDCPA regulates the activities of debt collectors concerning their communications with consumers, prohibiting harassment or abuse, false or misleading representations, and unfair practices.

Fixed Length Record

A record that always contains the same number of characters.

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.

Fixed Rate Loan

A loan in which the interest rate does not change during the entire term of the loan.

Glossary of Terms

**Flexible Spending
Credit Card**

Credit card with no preset spending limit. The credit card has a Credit Limit, but the terms of the card allow the consumer to exceed that amount. Refer to Frequently Asked Question 51 for reporting guidelines.

Forbearance

A period of time during repayment in which a borrower is permitted to temporarily postpone making regular monthly payments. The debt is not forgiven, but payments are suspended until a later time. As an example, forbearance may be granted if a borrower is experiencing temporary financial difficulty. A forbearance agreement is most commonly applied to mortgages and student loans. However, forbearance is applicable to any type of loan. Refer to Frequently Asked Question 45 for reporting guidelines.

**Installment
(Portfolio Type)**

A loan repayable in installments, usually in set monthly amounts.

Lease Assumption

The debtor's assumption of personal liability for leases of personal property that would otherwise be discharged in bankruptcy. When a lease is assumed, the consumer is assuming use of the personal property, such as an auto, as well as payment on the account.

**Line of Credit
(Portfolio Type)**

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.

Loan Assumption

Full Loan Assumption – A new borrower assumes responsibility for a loan. The original borrower is terminated from the loan and is no longer responsible for payments. Refer to Frequently Asked Question 55 for reporting guidelines.

Simple Loan Assumption – A new borrower assumes responsibility for a loan. The original borrower remains responsible in the event that the new borrower defaults. Refer to Frequently Asked Question 56 for reporting guidelines.

Glossary of Terms

Mortgage (Portfolio Type)	A written conveyance of title (i.e., contract or deed) to real estate property. 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.
Open (Portfolio Type)	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 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 Buyers, Student Loan Guarantors, the U.S. Department of Education (as guarantor) and Utility Services' payment plans.
Personal Receivership	A voluntary debt repayment plan filed in Wisconsin (Chapter 128) that is an alternative to Bankruptcy. The consumer may include debts they want managed by the court. The plan is administered by a court-appointed trustee and lasts for a period of time no more than three years. Refer to Frequently Asked Question 61 for reporting guidelines.
Reaffirmation of Debt	An agreement by a debtor to continue paying a dischargeable debt after the bankruptcy, usually for the purpose of keeping collateral or mortgaged property that would otherwise be subject to repossession. This agreement is done through the U.S. Bankruptcy Court.
Reaffirmation of Debt Rescinded	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.
Redeemed	When merchandise is repossessed or foreclosure is started on property, the consumer can "redeem" the merchandise or property by paying the debt in full.

Glossary of Terms

**Redemptions
(due to Bankruptcy)**

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.

Reinstated

When merchandise is repossessed or to avoid foreclosure, the consumer can "reinstate" the loan by bringing account payments current; i.e., making up all late payments, including applicable fees and late charges.

Relief from Stay

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.

**Revolving
(Portfolio Type)**

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.

Short Sale

The sale of real estate in which the proceeds from the sale fall short of the balance owed on the loan, which is secured by the property sold. In a short sale, the lender agrees to discount the loan balance, typically due to an economic or financial hardship on the part of the consumer.

Standard

The term "standard" appears in the Credit Reporting Resource Guide® (CRRG®) and other training materials associated with the Metro 2® Format. When used in the CRRG® or other Metro 2® training materials, the term "standard" refers to the formatting instructions that guide furnishers to report information to the consumer reporting agencies that accept data in the Metro 2® Format. The term also refers to the information fields and codes that are intended to promote consistent reporting of information about consumers to the consumer reporting agencies that accept data in the Metro 2® Format.

Entities furnishing data in the Metro 2® Format are responsible for furnishing data that they believe will satisfy their obligations in compliance with relevant laws. Neither the Metro 2® Task Force nor CDIA is responsible for determining whether a particular furnisher has satisfied its obligations to accurately report information.

Glossary of Terms

Third Party Collection Agency

A company or individual who specializes in collecting outstanding debts for other businesses or individuals.

Variable/Adjustable Rate Loan

A loan in which the interest rate is periodically adjusted based on a variety of indices, usually in response to changes in the Treasury Bill rate or the prime rate.

Variable Length Records

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.

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.

Validation/Implementation Checklist

CHECKLIST USES

This valuable checklist may be used for many purposes, including:

- Self-auditing tool to ensure accuracy and integrity of your data
- Validating that your Metro 2® output is still accurate when changes are made to your internal systems
- Upgrading your existing Metro 2® Format program
- Converting from Metro™ to Metro 2®
- Developing new Metro 2® software

The 2010 FACT Act Data Furnisher rules state that “each furnisher must review its policies and procedures periodically and update them as necessary to ensure their continued effectiveness”. The checklist can help you with this validation process.

IMPLEMENTATION OF THE METRO 2® FORMAT

When used to implement a new Metro 2® program or to change from Metro™ to Metro 2®, this checklist will guide you step by step through the process.

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 according to industry standard guidelines. 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® Validation/Implementation Checklist to review in detail what the processor will be reporting to ensure that your portfolio information is reported accurately.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
1	Obtain a copy of the Metro 2® Format.			Electronically: http://www.cdiaonline.org/metro.cfm Hard copy: http://www.cdiaonline.org/store_products.cfm
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>		
	Header Record - Identification of Reporter:			
	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 Identifier	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.

Validation/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	
	Base Segment - Processing Information:			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 4-5		
	Base Segment - Account Information:			
	Identification Number	Page 4-6		
	Cycle Identifier	Page 4-6		See FAQ 11.
	Consumer Account Number	Page 4-6		
	Portfolio Type	Page 4-7		
	Account Type	Page 4-7		See Exhibits 1 & 2.
	Date Opened	Page 4-7		
	Credit Limit	Page 4-8		
	Highest Credit or Original Loan Amount	Page 4-8		
	Terms Duration	Page 4-9		See Exhibit 3.
	Terms Frequency	Page 4-9		See Exhibit 3.
	Scheduled Monthly Payment Amount	Page 4-10		See Exhibit 3.
	Actual Payment Amount	Page 4-10		
	Account Status	Page 4-11		See FAQs 12 & 41 and Exhibit 4.
	Payment Rating	Page 4-11		See FAQ 12.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	Payment History Profile (up to 24 months)	Page 4-12		See FAQs 22 & 41 and Exhibit 5.
	Special Comment	Page 4-13		See FAQ 12 and Exhibits 6 & 7.
	Compliance Condition Code ¹	Page 4-14		See Exhibit 8.
	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 22 and Exhibit 9.
	Date Closed	Page 4-18		
	Date of Last Payment	Page 4-18		
	Interest Type Indicator	Page 4-18		
	Base Segment - Primary Borrower Information:			
	Consumer Transaction Type	Page 4-18		
	Surname	Page 4-19		Include edits to remove internal messages.
	First Name	Page 4-19		
	Middle Name	Page 4-20		
	Generation Code	Page 4-20		
	Social Security Number	Page 4-20		
	Date of Birth	Page 4-21		
	Telephone Number	Page 4-21		
	ECOA Code	Page 4-21		See FAQs 13, 14, 16 & 18 through 20 and Exhibit 10.
	Consumer Information Indicator ¹	Page 4-22		See FAQs 23 through 32 & 61 and Exhibit 11.

¹ 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.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	Country Code	Page 4-22		See Exhibit 12.
	First Line of Address	Page 4-23		See Exhibit 13. Include edits to remove internal messages.
	Second Line of Address	Page 4-23		
	City	Page 4-23		
	State	Page 4-24		See Exhibit 14.
	Postal/Zip Code	Page 4-24		
	Address Indicator	Page 4-24		
	Residence Code	Page 4-24		
4	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 FAQs 3, 6, 7 & 17.
	Segment Identifier - J1	Page 4-25	Hard code	
	Consumer Transaction Type	Page 4-25		
	Surname	Page 4-26		Include edits to remove internal messages.
	First Name	Page 4-26		
	Middle Name	Page 4-26		
	Generation Code	Page 4-27		
	Social Security Number	Page 4-27		
	Date of Birth	Page 4-28		
	Telephone Number	Page 4-28		
	ECOA Code	Page 4-28		See FAQs 13, 14, 16, 18 & 19 and Exhibit 10.
	Consumer Information Indicator ¹	Page 4-29		See FAQs 23 through 32 & 61 and Exhibit 11.

¹ 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.

Validation/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 FAQs 3, 6, 7 & 17.
	Segment Identifier - J2	Page 4-30	Hard code	
	Consumer Transaction Type	Page 4-30		
	Surname	Page 4-31		Include edits to remove internal messages.
	First Name	Page 4-31		
	Middle Name	Page 4-31		
	Generation Code	Page 4-32		
	Social Security Number	Page 4-32		
	Date of Birth	Page 4-33		
	Telephone Number	Page 4-33		
	ECOA Code	Page 4-33		See FAQs 13, 14, 16 & 18 through 20 and Exhibit 10.
	Consumer Information Indicator ¹	Page 4-34		See FAQs 23 through 32 & 61 and Exhibit 11.
	Country Code	Page 4-34		See Exhibit 12.
	First Line of Address	Page 4-35		See Exhibit 13. Include edits to remove internal messages.
	Second Line of Address	Page 4-35		
	City	Page 4-35		
	State	Page 4-36		See Exhibit 14.
	Postal/Zip Code	Page 4-36		
	Address Indicator	Page 4-36		
	Residence Code	Page 4-36		

¹ 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.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
5	For Collection Agencies, Debt Buyers, Check Guarantee Companies, Student Loan Guaranty Agencies, and U.S. Department of Education, a K1 Segment is needed. Fields available:			The K1 Segment is required for these companies.
	Segment Identifier - K1	Page 4-37	Hard code	
	Original Creditor Name	Page 4-37		
	Creditor Classification	Page 4-38		
6	If you've purchased or sold an account, a K2 Segment can be reported. Fields available:			See FAQs 47 & 48.
	Segment Identifier - K2	Page 4-39	Hard code	
	Purchased From/Sold To Indicator	Page 4-39		
	Purchased From or Sold To Name	Page 4-39		
7	If you provide mortgage information, a K3 Segment can be reported. Fields available:			
	Segment Identifier - K3	Page 4-40	Hard code	
	Agency Identifier	Page 4-40		
	Account Number (of secondary marketing agency)	Page 4-40		
	Mortgage Identification Number	Page 4-40		
8	Specialized payment information, for balloon or deferred payments, can be reported in the K4 Segment. Fields available:			
	Segment Identifier - K4	Page 4-41	Hard code	
	Specialized Payment Indicator	Page 4-41		
	Deferred Payment Start Date	Page 4-41		See FAQ 44.
	Balloon Payment Due Date	Page 4-41		
	Balloon Payment Amount	Page 4-41		

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
9	Account Number and/or Identification Number changes can be reported in the L1 Segment. Fields available:			See FAQ 5.
	Segment Identifier - L1	Page 4-42	Hard code	
	Change Indicator	Page 4-42		
	New Consumer Account Number	Page 4-42		
	New Identification Number	Page 4-43		
10	Can employment information for the primary borrower be provided in the N1 Segment? Fields available:			
	Segment Identifier - N1	Page 4-44	Hard code	
	Employer Name	Page 4-44		
	First Line of Employer Address	Page 4-44		
	Second Line of Employer Address	Page 4-44		
	Employer City	Page 4-44		
	Employer State	Page 4-44		
	Employer Postal/Zip Code	Page 4-44		
	Occupation	Page 4-45		
11	Can totals be provided in the Trailer Record? Fields available:			
	Record Descriptor Word (RDW)	Page 4-46		See FAQ 9.
	Record Identifier - TRAILER	Page 4-46	Hard code	
	Total Base Records	Page 4-46		
	Total of Status Code DF (Delete due to fraud)	Page 4-46		
	Total Associated Consumer Segments (J1)	Page 4-46		
	Total Associated Consumer Segments (J2)	Page 4-46		
	Block Count	Page 4-46		
	Total of Status Code DA (Delete – other than fraud)	Page 4-46		
	Total of each Status Code individually	Pages 4-46 through 4-48		
	Total of ECOA Code Z (Delete borrower)	Page 4-48		
	Total Employment Segments	Page 4-48		
	Total Original Creditor Segments	Page 4-48		

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	Total Purchased From/Sold To Segments	Page 4-48		
	Total Mortgage Information Segments	Page 4-48		
	Total Specialized Payment Information Segments	Page 4-48		
	Total Change Segments	Page 4-48		
	Total SSNs (All Segments)	Page 4-49		
	Total SSNs (Base Segments)	Page 4-49		
	Total SSNs (J1 Segments)	Page 4-49		
	Total SSNs (J2 Segments)	Page 4-49		
	Total Dates of Birth (All Segments)	Page 4-49		
	Total Dates of Birth (Base Segments)	Page 4-49		
	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		
12	<i>Review the following reporting situations:</i>			
	How should returned checks be reported to comply with the Fair Credit Reporting Act?			See FAQ 15.
	How can an account, or specific borrower, be deleted from the file?			See FAQ 16.
	What causes duplicate tradelines?			See FAQ 21.
	If you are a first time reporter of credit data, there are special reporting requirements.			See FAQ 22.
	How should an account be reported when the consumer files bankruptcy, but the account is not included in the bankruptcy?			See FAQ 23.
	How should an account included in bankruptcy be reported if a "Relief from Stay" is granted to the creditor?			See FAQ 24.
	How should an account that has been included in Bankruptcy be reported when a consumer is making payments or has paid the account in full, even though the account has not been reaffirmed?			See FAQ 25.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	How do you report accounts that are completely or partially reaffirmed in bankruptcy?			See FAQ 26.
	How should an account be reported when one or more borrowers filed Bankruptcy Chapter 7, 11 or 12?			See FAQs 27(a) and 27(b).
	How should an account be reported when one or more borrowers filed Bankruptcy Chapter 13?			See FAQs 28(a) and 28(b).
	How should a secured debt (e.g., mortgage account) be reported when a consumer completes the required payments through a Bankruptcy Chapter 12 or 13 plan, but the account is still open and the consumer is continuing to make payments?			See FAQ 29.
	How should multiple bankruptcies (i.e., the same or different chapters) be reported for the different associated borrowers on an account?			See FAQ 30.
	How should Bankruptcies be reported when the consumer voluntarily surrenders or redeems the merchandise?			See FAQ 31.
	How should an account be reported when a Bankruptcy case has been closed or terminated without being discharged or dismissed?			See FAQ 32.
	When and how should Debit Cards be reported?			See FAQ 33.
	How should charge-offs, paid charge-offs and partially charged off accounts be reported?			See FAQs 34(a), 34(b) & 34(c).
	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 35.
	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 36.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	How should an account be reported when an auto lease is prepaid – where entire lease payment is paid at the time of opening?			See FAQ 37.
	How should accounts that are paid in full for less than the full balance (i.e., settled) be reported?			See FAQ 38.
	How should paid in full, closed accounts be reported?			See FAQ 39.
	How should a closed account be reported that has an outstanding balance?			See FAQ 40.
	How long should paid accounts (Account Status Codes 13, 61-65) continue to be reported?			See FAQ 41.
	How should a renegotiated/refinanced loan be reported?			See FAQ 42.
	How should lost or stolen credit cards be reported?			See FAQ 43.
	How should deferred loans be reported?			See FAQ 44.
	How should accounts in forbearance be reported?			See FAQ 45.
	How should accounts that have been transferred be reported?			See FAQ 46.
	How should accounts that have been sold to another company be reported?			See FAQ 47.
	How should accounts that have been purchased from another company be reported?			See FAQ 48.
	How are "payment reversal" transactions handled?			See FAQ 49.
	How do you report loans with multiple payment schedules?			See FAQ 50.
	How should credit cards with no preset spending limits be reported that have terms allowing consumers to exceed the credit limits?			See FAQ 51.
	How should the different stages of foreclosure be reported?			See FAQ 52.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	How should alternatives to foreclosure (i.e., Deed in Lieu and Short Sale) be reported?			See FAQ 53.
	How should a secured account (i.e., mortgage, home equity or other secured account) be reported when the collateral is released but there is an outstanding balance due?			See FAQ 54.
	How should full loan assumptions be reported?			See FAQ 55.
	How should simple loan assumptions be reported?			See FAQ 56.
	How should reverse mortgages be reported?			See FAQ 57.
	How should an account be reported when the consumer is affected by a natural or declared disaster?			See FAQ 58.
	How should prepaid credit cards/gift cards be reported?			See FAQ 60.
	How should an account be reported when it is included in a Personal Receivership plan (Wisconsin Chapter 128)?			See FAQ 61.
	How should an account be reported when merchandise has been repossessed or the consumer has voluntarily surrendered the merchandise?			See FAQ 62.
	How should a replacement credit card be reported (i.e., credit card replaced with a new account number)?			See FAQ 63.
	How should an account be reported when the creditor files a Form 1099-C (Cancellation of Debt) with the IRS?			See FAQ 64.
	How should timeshare mortgages and timeshare loans be reported?			See FAQ 65.

Validation/Implementation Checklist

STEP	TASK DESCRIPTION	REFERENCE	COMMENTS
13	<i>Include the following cross-field edits:</i>		
	Portfolio Type / Account Type	See Exhibit 2.	
	Portfolio Type / Credit Limit	See Base Segment Field 11.	
	Portfolio Type / Highest Credit or Original Loan Amount	See Base Segment Field 12.	
	Portfolio Type / Account Type / Terms Duration	See Base Segment Field 13 & Exhibit 2.	
	Terms Duration / Terms Frequency / Scheduled Monthly Payment Amount	See Exhibit 3.	
	Date Opened / Payment History Profile		Amount of history reported should not be older than the Date Opened.
	Date of Account Information / Account Status		Account Status is reported "as of" the Date of Account Information.
	Date of Account Information/Payment History Profile (PHP)		First position of PHP represents month prior to Date of Account Information.
	Account Status / Payment Rating	See Base Segment Fields 17A & 17B.	
	Account Status / Current Balance / Amount Past Due		Monetary fields should be validated based on the status reported. Examples: <ul style="list-style-type: none"> Account Status 11 (Current) requires Amount Past Due = 0. Account Status 13 (Paid account) requires Current Balance and Amount Past Due = 0.
	Date of First Delinquency / Account Status / Payment Rating / Consumer Information Indicator	See Base Segment Field 25 or Exhibit 9.	
	Charge-off and Paid Charge-off Account Status / Original Charge-off Amount		Original Charge-off Amount is required for Account Statuses 97 and 64.
	Paid or Sold Account / Current Balance / Date Closed	See FAQs 38, 39 & 47.	Date Closed is required and Current Balance = 0.
	Closed Special Comments or Compliance Condition Codes/ Date Closed		Date Closed is required.

Validation/Implementation Checklist

ECOA Codes when Multiple Borrowers	See Exhibit 10.	
------------------------------------	-----------------	--

STEP	TASK DESCRIPTION	REFERENCE	AVAILABLE YES OR NO?	COMMENTS
	<i>Project Phases:</i>			
14	Review the Metro 2® Format and any conversion questions with your consumer reporting agency representative.	Exhibit 15: Data Conversion Checklist		
15	Determine whether data will be reported in the Character or Packed Format.			Character Format is preferred.
16	Develop internal software, and perform internal conversion tests.			
17	To set-up for electronic transmissions, which is the preferred method of reporting, contact all consumer reporting agencies.			
18	Advise all consumer reporting agencies of the expected date they will receive the test transmission or media.			
19	Send test transmission, record layout, and documentation to ALL consumer reporting agencies.			
20	Make corrections to your credit reporting format and data, as required.			
21	Send transmission to all consumer reporting agencies.			

Child Support Reporting

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 13¹

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, 82-84²

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

Status 93²

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 05¹

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.

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

² 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 13¹

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 05¹

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.

¹ 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 Exhibit 8 in the Metro 2® Format 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.

Debt Buyer/Third Party Collection Agency Reporting

GENERAL REPORTING GUIDELINES

A Debt Buyer is a company or individual who purchases accounts (generally non-performing debts) with the intent of collecting debts owed. A Third Party Collection Agency is a company or individual who specializes in collecting outstanding debts for other businesses or individuals.

- Report data in the standard Metro 2® Format, including the Header Record.
- Report at least on a monthly basis.
- Report the complete name, address, social security number and date of birth for 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 forwarded or sold to another entity (Debt Buyers)
 - Accounts which have been canceled and returned to creditor (Third Party Collection Agencies)
 - Accounts reported in error
 - Accounts which have been confirmed as fraudulent
 - Accounts for consumers who are deceased
 - Accounts that are being paid by insurance or were paid in full through insurance (not by the consumer)
 - Accounts of consumers who have a Discharged Bankruptcy Chapter 7 or are currently in a Chapter 13 repayment plan (Third Party Collection Agencies)

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

- 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.
- The Creditor Classification must be reported in the K1 Segment to identify the original creditor's type of business. Note that code 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.
- In the Identification Number field, report the internal code that identifies the debt buyer or third party collection agency 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.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY 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 L1 Segments are reported.
2. Portfolio Type (Base Segment, Field 8) — O (Open)
3. Account Type Codes (Base Segment, Field 9)
 - 0C — Debt Buyer
 - 48 — Collection Agency/Attorney
 - 77 — Returned Check
4. Date Opened (Base Segment, Field 10) — the date the account was purchased by the debt buyer or placed/assigned to the third party collection agency. 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 purchased, placed or assigned. 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 – see below)
 - Accounts reported in error
 - Consumer is deceased. (if no other associated consumer remains responsible for the account)
 - Accounts that are being paid by insurance or were paid in full through insurance (not by the consumer)
 - Debt Buyers must also delete accounts that have been forwarded or sold to another entity.
 - Third Party Collection Agencies must also delete accounts for the following reasons:
 - Accounts that have been canceled and returned to the creditor
 - Accounts of consumers who have a Discharged Bankruptcy Chapter 7 or are currently in a Chapter 13 repayment plan

Do not delete paid in full collection accounts.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY 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 sold or placed for collection.

Example:

Original Credit Grantor Reports:

Date of Account Information	Account Status Code	Definition	Date of First Delinquency
01/31/2015	11	Current (0-29 days past the due date)	Zero fill
02/28/2015	71	30-59 days past the due date	02/28/2015
03/31/2015	78	60-89 days past the due date	02/28/2015
04/30/2015	80	90-119 days past the due date	02/28/2015
05/31/2015	82	120-149 days past the due date	02/28/2015
06/30/2015	83	150-189 days past the due date	02/28/2015

Account is sold to debt buyer or assigned to collection agency.

Debt Buyer/Collection Agency Reports:

Date of Account Information	Account Status Code	Definition	Date of First Delinquency
08/31/2015	93	Collection	02/28/2015
09/30/2015	93	Collection <i>Consumer agrees to a repayment plan. First payment is received by debt buyer, collection agency or credit grantor's internal collection department.</i>	02/28/2015
10/31/2015	93	Collection <i>Consumer continues to make payments. Current Balance is reported as decreasing.</i>	02/28/2015
11/30/2015	62	Paid collection account <i>Current Balance is reported as zero.</i>	02/28/2015

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.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

FCRA Compliance/Date of First Delinquency (continued)

Effective March 31, 2004, the FCRA¹ 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.
11. Date of Last Payment (Base Segment, Field 27) – the date of the most recent payment made to the debt buyer or third party collection agency.

¹ Fair Credit Reporting Act Section 623(a)(5) [15 U.S.C. § 1681s-2]

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

12. Address (Base Segment, Fields 39 – 45; J2 Segment, Fields 12 – 18) – report the consumer's full address as provided by the original creditor or a newer known address. If the consumer's current address is unknown, report the consumer's last known address and Address Indicator 'N' (not confirmed address).

Note: An address found through skip tracing processes should be reported only when confirmed to be the address of the consumer you are reporting.

13. 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). Refer to Exhibit 10 in the Metro 2® Format for a list of available codes.

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

For accounts with more than one associated borrower, if one borrower becomes deceased, report ECOA Code Z (Delete Consumer) for that borrower. In subsequent reporting periods, only the remaining consumer should be reported.

14. 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 11 in the Metro 2® Format for a list of available indicators.

Note: Debt Buyers should not report purchased accounts that were included in discharged/completed Bankruptcies.

15. 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. Note that code 02 (Medical/Health Care) is used to identify an account as a medical collection debt in accordance with FCRA section 623.

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.

DEBT BUYER/THIRD PARTY COLLECTION AGENCY REPORTING GUIDELINES

16. 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

17. **Debt Buyers only** – An optional segment that may be reported is the K2 Segment, which contains the name of the company from which the account was purchased. If the original creditor name, which is reported in the K1 Segment, and the name of the company from which the account was purchased, are the same, the K2 Segment should not be reported.

Mortgage Loan Modifications

GENERAL REPORTING GUIDELINES

Report accounts in the standard Metro 2® Format. Refer to the Field Definitions module for detailed reporting guidelines.

Making Home Affordable Program (HAMP)

• First Liens	Page 11-2
• Second Liens	Page 11-5
Home Affordable Foreclosure Alternatives SM (HAFA)	Page 11-6
Hardest Hit Fund (Unemployment Assistance)	Page 11-7
Other Unemployment Programs	Page 11-8
Hope for Homeowners Program	Page 11-9
Mortgage Loan Modification Program – Freddie Mac and Fannie Mae	Page 11-10
Home Affordable Refinance Program (HARP)	Page 11-11
General Guidelines for Renegotiated/Refinanced Accounts	Page 11-11

MAKING HOME AFFORDABLE PROGRAM

First Liens

Program Description

The consumer must first make three reduced payments during the 3-month trial period before the loan modification becomes effective.

If the three payments are made, the loan will be modified for the purpose of creating an affordable payment plan for the consumer. Commonly, Terms Duration may be extended and Scheduled Monthly Payment Amounts may be changed. A portion of the principal loan amount may be set aside, but must be paid upon transfer, payoff, sale, or at maturity.

Reporting Guidelines for Trial Period:

The guidelines below should be followed when reporting payments during the trial period:

1. Current, but facing imminent default or Current, but eligible for loan modification

If the consumer was current on his/her payments prior to the trial period, and makes each month's trial period payment on time, report the consumer as current (Account Status 11) during the trial period. If the consumer is at least 30 days past due during the trial period, report the Account Status Code that reflects the appropriate level of delinquency.

Report the trial period payment in the Scheduled Monthly Payment Amount field. Special Comment Code 'AC' (Paying under a partial payment agreement) should also be reported.

2. Delinquent

If the consumer was delinquent (at least 30 days past the due date) prior to the trial period and the reduced payments do not bring the account current, report the Account Status Code that reflects the appropriate level of delinquency.

Report the trial period payment in the Scheduled Monthly Payment Amount field. Special Comment Code 'AC' (Paying under a partial payment agreement) should also be reported.

(continued)

MAKING HOME AFFORDABLE PROGRAM

First Liens (continued)

After the trial period:

If the loan is not modified, report the account as per the original contractual agreement.

If the loan is modified, the guidelines below for modified loans should be followed. Report the appropriate Account Status Code for each reporting period based on the new terms of the loan. Prior payment history reported on the account will be retained.

Reporting Guidelines for Modified Loans

Continue to report one tradeline under the original Account Number.

- Date Opened = the date the account was originally opened
- Original Loan Amount = the original amount of the loan, including the Balloon Payment Amount, if applicable
- Terms Duration = the modified terms
- Scheduled Monthly Payment Amount = new scheduled monthly payment amount as per the modified agreement
- Current Balance = the principal balance (including the Balloon Payment Amount if applicable), plus late charges, fees, interest and escrow that are due during the current reporting period

Note: If a portion of the loan is forgiven, the forgiven amount should be deducted from the Current Balance owed.

- Account Status Code = the appropriate code based on the new terms of the loan
- Special Comment Code = CN (Loan modified under a federal government plan)

Note: Special Comment Code CN should be reported as long as deemed appropriate by the data furnisher (such as, for 5 years until the interest rate is lowered), or until another special comment becomes more critical. For the length of time the special comment should be reported, consult with your internal Legal or Compliance department.

(continued)

MAKING HOME AFFORDABLE PROGRAM

First Liens (continued)

- K4 Segment = used to report the Balloon Payment or principal forbearance information, if applicable:
 - Specialized Payment Indicator = 01 (Balloon Payment)
 - Balloon Payment Due Date = the date the balloon payment is due which is equal to maturity of the amortizing portion of the loan.

Note: The payoff date can be used in this field.

- Balloon Payment Amount = the amount of the balloon payment in whole dollars only

Note: If your system requires you to change the Account Number, report the L1 Segment with the new Account Number, following reporting guidelines for the L1 Segment.

MAKING HOME AFFORDABLE PROGRAM

Second Lien Modification Program (2MP)

Under 2MP, when a borrower's first lien is modified under HAMP (Home Affordable Modification Program) and the servicer of the second lien is a 2MP participant, that servicer must offer either to modify the borrower's second lien according to a defined protocol or to accept a lump sum payment from Treasury in exchange for full extinguishment of the second lien.

Reporting Guidelines for Modified Second Liens and Partially Extinguished Second Liens

Follow the reporting guidelines for modified first liens (including the trial period and the modified loan) as described on pages 11-2 through 11-4.

For partially extinguished second liens, the forgiven portion of the loan should be deducted from the Current Balance owed.

IMPORTANT NOTE: When a borrower is current on the existing second lien and the current contractual payment amount is equal to or greater than the monthly payment that will be due following the 2MP modification, a trial period may not be required. The servicer and borrower may execute a modification of the second lien immediately following modification of the HAMP-modified first lien.

Reporting Guidelines for Extinguished Second Liens

Second liens that are fully extinguished under 2MP are forgiven and as such, are considered to be paid. Report all forgiven accounts as specified below:

- 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 Code = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero
- Date Closed = date the account was forgiven and considered to be paid

Note that payment history for the forgiven accounts will be retained.

HOME AFFORDABLE FORECLOSURE ALTERNATIVESSM (HAFA)

HAFA provides two options for consumers: a Short Sale or a Deed-in-Lieu (DIL) of foreclosure.

In a short sale, the mortgage company allows the sale of the consumer's house for an amount that falls short of the amount still owed. Unlike conventional short sales, a HAFA short sale completely releases the consumer from the mortgage debt after selling the property. The consumer will no longer be responsible for the amount that falls short of the amount owed. The deficiency is guaranteed to be waived by the servicer.

In a Deed in Lieu, the mortgage company allows the consumer to give the title back, transferring ownership back to the mortgage company.

Reporting Guidelines

Follow the reporting guidelines in Frequently Asked Question & Answer 53 for Alternatives to Foreclosure: Deed in Lieu and Short Sale.

HARDEST HIT FUND (UNEMPLOYMENT ASSISTANCE)

Program Description

Treasury announced the Hardest Hit Fund program early in 2010 providing targeted aid to 18 states and the District of Columbia. The objective of the Housing Finance Agency's (HFAs) Hardest-Hit Fund is to allow HFAs to develop creative, effective approaches that consider local conditions. Treasury has outlined below many of the possible types of transactions that would meet the requirements of the Emergency Economic Stabilization Act of 2008.

- a. **Mortgage Modifications** – Programs may provide for mortgage modification of loans held by HFAs or other financial institutions or provide incentives for servicers / investors to modify loans.
- b. **Mortgage Modifications with Principal Forbearance** – Programs may provide for paying down all or a portion of an overleveraged loan and taking back a note from the borrower for that amount in order to facilitate additional modifications.
- c. **Short Sales / Deeds-In-Lieu of Foreclosure** – Programs may provide for assistance with short sales and deeds in lieu of foreclosure in order to prevent avoidable foreclosures.
- d. **Principal Reduction Programs for Borrowers with Severe Negative Equity** – Programs may provide incentives for financial institutions to write-down a portion of unpaid principal balance for homeowners with severe negative equity.
- e. **Unemployment Programs** – Programs may provide assistance to unemployed borrowers to help them avoid preventable foreclosures.
- f. **Second Lien Reductions** – Programs may provide incentives to reduce or modify second liens.

Reporting Guidelines

For reporting guidelines on the various types of transactions described above, refer to other sections within this module and to various Frequently Asked Questions & Answers.

OTHER UNEMPLOYMENT PROGRAMS

Home Affordable Unemployment Program

For consumers who are unemployed, depending on their situation, MHA's **Home Affordable Unemployment Program (UP)** may reduce the consumer's mortgage payments to 31 percent of their income or suspend payments altogether for 12 months or more. UP is not currently available for homeowners with mortgages held by Fannie Mae and Freddie Mac.

Fannie Mae's Unemployment Forbearance Program

Servicers have the flexibility to assist consumers who have a financial hardship due to unemployment. This program allows the consumer to receive a reduction or suspension of the monthly mortgage payment for a specific period of time. If during the final month of the initial Unemployment Forbearance period, the consumer remains unemployed, the servicer must determine if the consumer is eligible for an extension of Unemployment Forbearance of no more than six additional months.

Freddie Mac's Unemployment Forbearance Program

Freddie Mac's forbearance requirements provide a "short-term unemployment forbearance" relief option to assist consumers who are unable to make their mortgage payments due to unemployment. In addition, Freddie Mac offers an "extended unemployment forbearance" relief option to provide an extension of the forbearance period if the consumers have not regained employment after the short-term forbearance period has ended. These additional relief options give unemployed borrowers an opportunity to retain homeownership by providing mortgage payment relief while they seek re-employment.

Servicers have delegated authority to approve an eligible consumer for a short-term unemployment forbearance period of six months during which time the monthly mortgage payment is either suspended or reduced. If the consumer remains unemployed at the end of the short-term unemployment forbearance period, the Servicer must consider the consumer for extended unemployment forbearance. If the consumer meets the eligibility criteria for extended unemployment forbearance, the Servicer must obtain Freddie Mac's written approval before entering into an extended unemployment forbearance plan with the consumer.

Reporting Guidelines

Follow the reporting guidelines documented in Frequently Asked Question & Answer 45 for Accounts in Forbearance for the programs described above.

HOPE FOR HOMEOWNERS PROGRAM

The HOPE for Homeowners Act of 2008 created a new program within FHA to back FHA-insured mortgages to distressed borrowers. The new mortgages offered by FHA-approved lenders will refinance loans at a significant discount for homeowners facing difficulty meeting their mortgage payments.

Reporting Guidelines:

1. The original mortgage loan is considered to be closed due to refinance and a new loan is opened.

Report the original mortgage loan as specified below:

- 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 Code = AS (Account closed due to refinance)
- Current Balance and Amount Past Due = zero
- Date Closed = date the account was closed due to refinance

Note that payment history for the original mortgage loan will be retained.

Report the newly refinanced loan with the new Account Number, new Date Opened, Special Comment Code CN (Loan modified under a federal government plan) and all other applicable fields.

Note that payment history that occurred prior to the new Date Opened should **not** be reported with this account.

2. All subordinate liens on the property must be extinguished. Any such liens (i.e., loans or lines of credit) are forgiven and are considered to be paid.

Report all forgiven accounts as specified below:

- 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 Code = AU (Account paid in full for less than the full balance)
- Current Balance and Amount Past Due = zero
- Date Closed = date the account was forgiven and considered to be paid

Note that payment history for the forgiven accounts will be retained.

MORTGAGE LOAN MODIFICATION PROGRAM – FREDDIE MAC AND FANNIE MAE

Freddie Mac & Fannie Mae began offering a streamlined modification program starting 12/15/2008 for a targeted group of borrowers with certain loan criteria. As it relates to credit reporting, all eligible loans under this program must be at least 3 payments delinquent.

The consumer must first make three reduced payments during the 3-month trial period before the loan modification becomes effective. During that time, the data furnisher should report the true Account Status Code, which is delinquent, and Special Comment Code AC (Paying under a partial payment agreement).

If the three payments are made, the loan will be modified for the purpose of creating an affordable payment plan for the consumer. Terms Duration may be extended and Scheduled Monthly Payment Amounts may be changed. A portion of the principal loan amount may be set aside, but must be paid upon transfer, payoff, sale, or at maturity. This set-aside amount would be considered the balloon payment.

Reporting Guidelines:

Continue to report one tradeline under the original Account Number.

- Date Opened = the date the account was originally opened
- Original Loan Amount = the original amount of the loan, including the Balloon Payment Amount
- Terms Duration = the modified terms
- Scheduled Monthly Payment Amount = the new scheduled monthly payment amount as per the modified agreement
- Current Balance = the principal balance (including the Balloon Payment Amount if applicable), plus late charges, fees, interest and escrow that are due during the current reporting period
- Account Status Code = the appropriate code based on the new terms of the loan
- Special Comment Code = CN (Loan modified under a federal government plan)

NOTE: Special Comment Code CN should be reported as long as deemed appropriate by the data furnisher, or until another special comment becomes more critical. For the length of time the special comment should be reported, consult with your internal Legal or Compliance department.

- K4 Segment = used to report Balloon Payment or principal forbearance information:
 - Specialized Payment Indicator = 01 (Balloon Payment)
 - Balloon Payment Due Date = the date the balloon payment is due which is equal to maturity of the amortizing portion of the loan
Note: The payoff date can be used in this field.
 - Balloon Payment Amount = amount of the balloon payment in whole dollars only

HOME AFFORDABLE REFINANCE PROGRAM (HARP)

The guidelines documented in Frequently Asked Question & Answer 42 (General Guidelines for Renegotiated or Refinanced Loans) may be used when reporting loans refinanced under HARP.

GENERAL GUIDELINES FOR RENEGOTIATED/REFINANCED MORTGAGE ACCOUNTS

Refer to Frequently Asked Question and Answer 42 for general guidelines on reporting renegotiated or refinanced mortgage accounts (i.e., mortgage loans that are not modified through one of the federal government programs).

Student Loan Reporting

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, social security number and date of birth 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 installment accounts
- 15 (Line of Credit) for Education line of credit accounts

2. Terms Duration (Base Segment, Field 13)

- For installment accounts, report the number of months of the loan when the account is in repayment.
 - For loans in "initial school period" and a "grace period", blank fill the Terms Duration since there are currently no terms.
 - For loans in "forbearance", report the terms of the loan, which can be changed if the terms of the loan are extended.
- For line of credit accounts, report a constant of "LOC".

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

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

(continued)

LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

For student loans that are guaranteed:

- 05 (Account transferred) with Special Comment Code AL (Account assigned to government) – Use this combination of codes when a claim was accepted and paid by the guarantor.

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.

For student loans that are not guaranteed, the following additional Account Status Codes may be reported:

- 93 – Account assigned to internal or external collections
- 97 – Unpaid balance reported as a loss (charge-off)
- 62 – Account paid in full, was a collection account
- 64 – Account paid in full, was a charge-off

For student loans that are transferred to a new servicer:

Follow the standard guidelines in Frequently Asked Question and Answer 46.

For student loans that are sold to another company:

Follow the standard guidelines in Frequently Asked Question and Answer 47.

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

Examples:

- Special Comment AH (Purchased by another company) with Account Status Code 05 — when an account is purchased by another lender.
- Special Comment CJ (Credit line no longer available – in repayment phase) — when an Education Line of Credit goes from the borrowing phase to the repayment phase. (Note that Portfolio Type C and Account Type 15 should remain the same when the account goes into repayment.)
- Compliance Condition Code XB (Account information disputed by consumer under the Fair Credit Reporting Act) could be reported with a delinquent Account Status Code.

Lender/Service/Secondary Market Reporting Guidelines

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 11 in the Metro 2[®] Format for a list of available indicators.

Note: Refer to FAQ 23 for guidelines on reporting an account when a consumer files bankruptcy, but 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.

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.

LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

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.

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.

LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

For Loans that are Forgiven when a Student becomes Disabled or Deceased:

- If the loan had been in repayment prior to the student becoming disabled or deceased, 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.

For Rehabilitated Student Loans:

Section 428F(a)(1)(A) of the Higher Education Act of 1965 was amended by the Higher Education Opportunity Act of 2008 to require that, upon sale of a rehabilitated loan to an eligible lender, the guaranty agency or other holder of the loan must request any consumer reporting agency to which the guaranty agency or holder had reported the default of the loan to remove the record of default from the borrower's credit history.

To ensure the default is properly cleared from the borrower's credit history, follow the reporting guidelines documented on the next page.

Note: Please contact the consumer reporting agencies the first time you report rehabilitated loans.

(continued)

LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

Rehabilitated Student Loans (continued):

Original Lender (when rehabilitated loan purchased by another lender):

If Account Status Code 88 (Claim filed with government for insured portion of balance on defaulted loan) was reported when the default originally occurred, report the following codes in order to remove the default:

- Account Status = 05 (Account transferred)
- Payment Rating = 0 (Current account)
- Payment History Profile = For the months when the Account Status 88 was reported, report character 'D', which indicates no payment history available for those months.
- Optional Special Comment Code = AH (Purchased by another company)

Note: If the default occurred more than 2 years ago, the default must be removed via e-OSCAR®.

Original Lender (when rehabilitated loan re-purchased by the original lender):

There are three options for reporting, based on the lender's system:

1. If the original Account Number and Date Opened are retained and Account Status Code 88 (Claim filed with government for insured portion of balance on defaulted loan) or Account Status 05 (Transferred) was reported when the default originally occurred, report the following codes in order to remove the default:
 - Account Status Code = 11 (Current account)
 - Payment History Profile = For the months when the Account Status 88 or 05 was reported, report character 'D', which indicates no payment history available for those months.
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 original Account Number and Date Opened change and Account Status Code 88 (Claim filed with government for insured portion of balance on defaulted loan) was reported when the default originally occurred, report the original loan as specified:
 - Account Status Code = 05 (Account transferred)
 - Payment Rating = 0 (Current account)
 - Payment History Profile = For the months when the Account Status 88 was reported, report character 'D', which indicates no payment history available for those months.
 - Special Comment = AT (Account closed due to transfer)
 - Current Balance and Amount Past Due = zero

Additionally, if Account Status Code 88 or Account Status 05 was reported when the default originally occurred, report the newly rehabilitated loan with the new Account Number, 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.

LENDER/SERVICER/SECONDARY MARKET REPORTING GUIDELINES

Total and Permanent Disability Discharge Procedures for Title IV Loans

Federal Perkins Loan Program and FFEL:

Non-defaulted loans

- Report Account Status Code 05 and the Payment Rating that is consistent with the current or delinquent status of the account on the day the disability status is approved (i.e., 0, 1, 2, 3, 4, 5 or 6).

Account Status Code 05 is defined as 'Account transferred' and the Payment Rating indicates that the payment for this month was current or delinquent. Since the account is being transferred to the Department for further processing, this status is applicable.

- Report a Payment History Profile that represents the accurate account history that should be retained for the account.

Any credit history already established by the borrower would be retained for historical credit reporting purposes.

- No further reporting by the school is required, as Status Code 05 is a final status. The Department will be responsible for reporting the loan after assignment.

Federal Perkins Loan Program:

Defaulted loan (previously reported by the school as Account Status Code 93 – Collection)

- Report Account Status Code 05, Payment Rating G and Special Comment Code AL.

Account Status Code 05 is defined as 'Account transferred', Payment Rating G indicates that the account was a Collection prior to the transfer, and Special Comment Code AL states 'Student loan – assigned to government'.

All collection history already reported would be retained for historical credit reporting purposes.

- No further reporting by the school is required, as Status Code 05 is a final status. The Department will be responsible for reporting the loan after assignment.

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 FCRA¹ 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)

¹ 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 11 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 and Consumer who is Responsible for Payments is Deceased:

Report Account Status Code 62 and ECOA Code X.

For Accounts where the Student is Deceased and the Parent is Responsible for Payments:

Report Account Status Code DA to delete the account.

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

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.

For Loans that have an Unpaid Tuition Refund:

Report Account Status 62 and Special Comment AU. Note that the student paid the percentage of tuition owed and the remainder of the tuition was forgiven.

For Loans in Default that were Forgiven/Cancelled because the Student did not file the Proper Paperwork:

Report Account Status Code DA to delete the account.

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

Total and Permanent Disability Discharge Procedures for Title IV Loans

FFEL:

Defaulted loan held by the guarantor

Report Account Status Code DA, which is defined as 'Delete Entire Account'. Since the claim is being filed with the Department and the Department will be responsible for further processing of the loan, as well as credit reporting, the original Collection Account reported by the guaranty agency should be deleted.

Since the Department will be responsible for further credit bureau reporting on the loan after the loan has been assigned, only the Department should be reporting on the loan as a Collection Status '93'. Once the account is deleted by the guaranty agency, no further reporting would be required.

Loans that have been assigned to the U.S. Department of Education:

Non-defaulted loan

After the loan has been assigned to the Department and during the review period, the account should be reported each month as follows:

- Report Account Status Code 11 (Current) and Terms Frequency D (Deferred).
- Report the Deferred Payment Start Date in the K4 Segment to show the potential date when payments will be required.

If the Total and Permanent Disability is granted, Account Status Code 13 should be reported to indicate the account is paid. No further reporting is required.

If the Total and Permanent Disability is not granted, the Terms Frequency should be blank filled and the account should be reported normally as current or delinquent, until ultimately paid.

(continued)

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

Total and Permanent Disability Discharge Procedures for Title IV Loans

Loans that have been assigned to the U.S. Department of Education:

Defaulted loan

After the loan has been assigned to the Department and during the review period, the account should be reported each month as follows:

- Report Account Status Code 93 (Collection) and Terms Frequency D (Deferred).
- Report the Deferred Payment Start Date in the K4 Segment to show the potential date when payments will be required.

If the Total and Permanent Disability is granted, Account Status Code 62 should be reported to indicate the account is paid. No further reporting is required.

If the Total and Permanent Disability is not granted, the Terms Frequency should be blank filled and the account should continue to be reported as Account Status Code 93, until ultimately paid.

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.

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. Note that when loans are rehabilitated, the original lender is required to remove the record of default from the consumer's credit history.

STUDENT LOAN GLOSSARY OF TERMS

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.

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

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 L1 Segments are reported.

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 Exhibit 8 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®

ABOUT e-OSCAR®

Access to e-OSCAR®, the **O**nline **S**olution for **C**omplete and **A**ccurate **R**eporting, is through a secure website. Each data furnisher has a unique registration and all users have their own user id and password. For more information on e-OSCAR®, visit <http://www.e-OSCAR.org>.

CONSUMER DISPUTE PROCESS

The Fair Credit Reporting Act (FCRA) 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, a reseller of consumer reports or directly with the data furnisher. ***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/1999/08/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 and 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.

NOTE: After completion of a dispute investigation, it is imperative that data furnishers update their internal records to avoid re-reporting incorrect information.

The law also mandates a deadline for the completion of the investigation, review, and reporting of the investigation results. Per the FCRA, the consumer's dispute investigation must be completed within 30 days (45 days for FACT Act report). The time ***begins when the consumer contacts the consumer reporting agency.*** See sections 623 (b) (2) and 611 (a) (1).

e-OSCAR[®] Consumer Dispute Process

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[®], is available for use by all data furnishers.

ACDV WORKFLOW

- Each consumer reporting agency and data furnisher has its own access to e-OSCAR[®].
- When a consumer contacts a consumer reporting agency with a dispute, the agency transmits the disputed information and, if applicable, one or more images of relevant, consumer-provided documentation through e-OSCAR[®]. The data furnisher accesses e-OSCAR[®] and retrieves the disputed data and any associated document image(s). A possible exception to this process is when a consumer reporting agency updates the disputed item based on the information provided by the consumer (i.e., a valid police report). In this case, a dispute may not be transmitted via an ACDV.
- The data furnisher researches the disputed account and transmits a response back to the originating consumer reporting agency via e-OSCAR[®]. 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 carbon copies to any other consumer reporting agencies with which the data furnisher's registration is active in e-OSCAR[®].

Note: Responding to disputes varies from automated data reporting because when replying to a dispute, a data furnisher may be required to update historical account information. Dates and other account fields may need to be adjusted. For that reason, in some cases, data furnishers may not be able to follow the guidance published in the Credit Reporting Resource Guide[®], which is intended for regular monthly updates to previously-reported accounts.

e-OSCAR® Consumer Dispute Process

- The consumer reporting agencies receive responses, update the credit files accordingly and respond back to the consumers.
- The originating consumer reporting agency also notifies the data furnisher via e-OSCAR of any account modifications or deletions as a result of the dispute reinvestigation. These notifications may include, if applicable, one or more images of relevant, consumer-provided documentation.
- **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 ACDV

- **Automatic Carbon Copies** – If a data furnisher 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 the data furnisher's registration is active in e-OSCAR®. These copies help to pre-empt future disputes, thus reducing the data furnisher's costs. Consumer credit data may be modified at all the agencies with which the data furnisher's registration is active in e-OSCAR®, which will help to improve consumer 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** — Information within a dispute response must be complete and logical. 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.

e-OSCAR®

THE UPDATE PROCESS

From time to time, data furnishers will find it necessary to update account information they 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 for interim maintenance requests to report updates to an account or to delete an account. AUD transactions are submitted through e-OSCAR®.

Reporting inaccuracies must be corrected promptly in order to comply with the Fair Credit Reporting Act. See section 623 (a) (2) (B).

AUTOMATED UNIVERSAL DATA PROCESS VIA e-OSCAR®

- The intent of the e-OSCAR® AUD process is to provide the consumer reporting agencies with a request to correct or delete a consumer's account. e-OSCAR® may not be used to add or create an account 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 account information in question needs to be modified, the company will use the e-OSCAR® system to complete an AUD.

e-OSCAR® Update Process

- 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 account 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 reporting relationships indicated by the data furnisher within e-OSCAR® and based on the subscriber codes specified in the AUD record.
- The consumer reporting agencies receive their AUDs from e-OSCAR® and update the consumers' files as appropriate per their internal business processes.
- **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

- **Ability to send to multiple CRAs** – 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. If the data furnisher modifies or deletes an account using the AUD process, e-OSCAR® sends the update to the consumer reporting agencies that the data furnisher designates when it submits the AUD. The data furnisher has the choice because it may not need to update an account on each of the consumer reporting agencies' databases. See section 623 (a) (2) (B) for information on the data furnisher's duty to correct and update information.
- **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.