

EXHIBIT 2

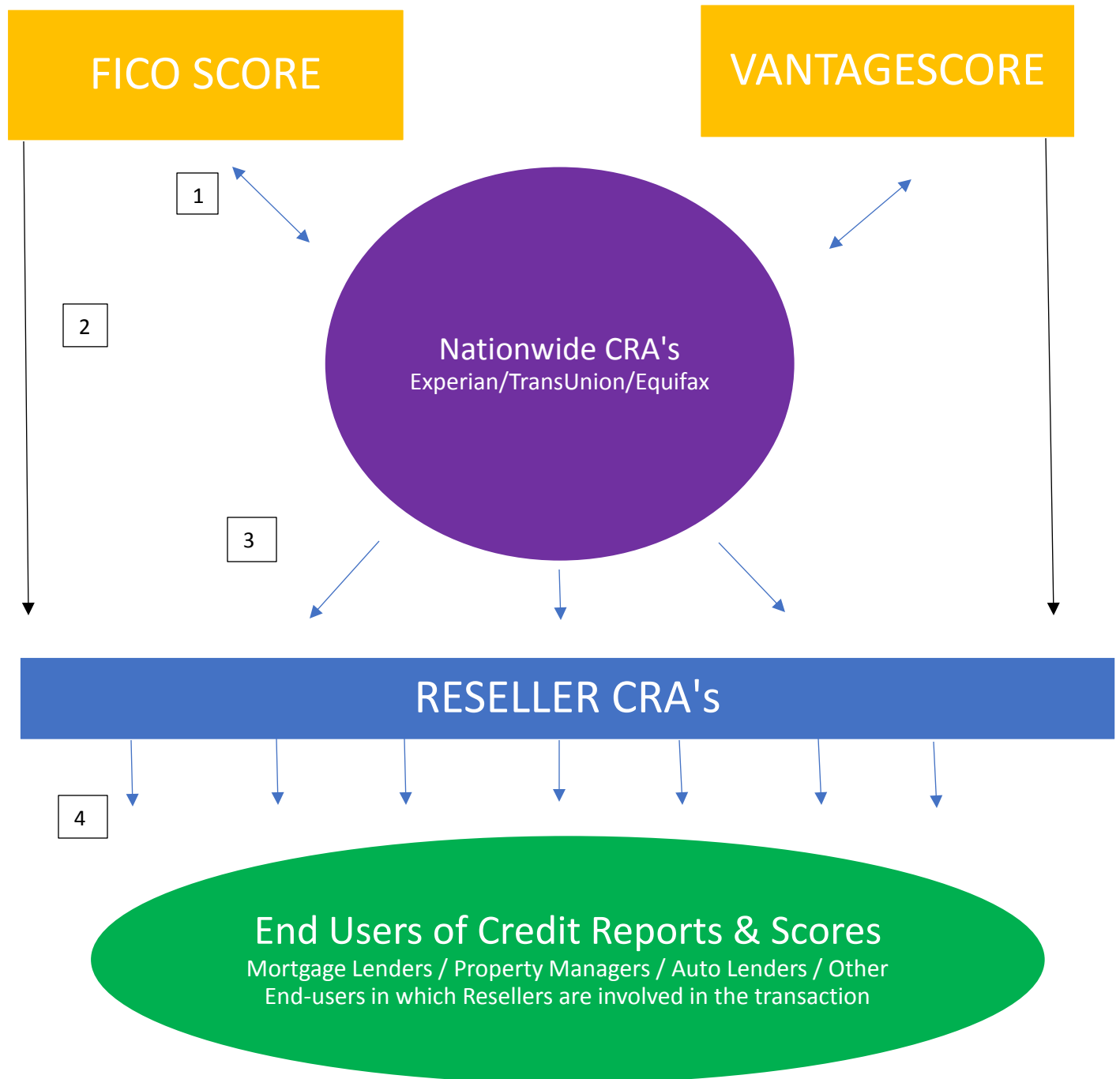


Exhibit 2 – Proposed Solution

1. This would be a revised contractual relationship that would now only focus on the access of data for score development and credit scores used in transactions in which a reseller is **not** participating. The nationwide CRAs would continue to negotiate a price for the credit score from the score developers for the scores sold by them directly to the end users, but not those sold via reseller CRAs. Each of the credit score developers would no longer negotiate a price with the nationwide CRAs for the scores required in reseller transactions, because those negotiations would be transferred to the resellers directly.
2. This new contractual relationship would only change the distribution of the score and the pricing of the score in reseller transactions (100% of all mortgage, rental screening, and many other transactions). The resellers would negotiate a price for the credit score from the score developers for them to pass along to the end users. This would eliminate the nationwide CRAs' ability to price competing credit score developers out of the market, and could even encourage new score model developers to enter a truly competitive credit score marketplace.
3. Similar to Exhibit 1, contract #2, except now the resellers would pay the nationwide CRAs for the cost of the credit reporting data and a flat fee for calculating the credit score of the end user's choice. This process should be overseen by the FHFA and/or CFPB and FTC, and the price paid to the nationwide CRAs for calculating the credit score should be a flat fixed fee that is the same cost, regardless of which score developer's model is calculated.
4. Similar to Exhibit 1, contract #3, but the cost of the credit score the end user pays the reseller is not subject to conflict of interest pricing as the reseller has negotiated that score price directly with the score developer. Because there will be a negotiated cost of the credit score and a fixed score calculation fee, regardless of score model developer, the ability to allow common ownership of the credit data used in the score development and credit score model is possible without the potential for unfair market power abuse.