

July 17, 2019

Ms. Laura Train
Associate Commissioner
Office of Data Exchange, Policy Publications, and International Negotiations
U.S. Social Security Administration

Dear Ms. Train:

On behalf of our member firms, representing leading payments companies, consumer data providers and thousands of financial institution in the United States, we write regarding the Social Security Administration's (SSA) ongoing efforts to implement Section 215 of S. 2155, the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174). We sincerely appreciate the productive dialogue our organizations have enjoyed thus far with you and many of your colleagues. As SSA opens enrollment today for the initial rollout of the Electronic Consent Based Social Security Number Verification service (eCBSV), we would like to take this opportunity to provide our perspective on a critical issue.

In regards to the selection process and, more specifically, the number of firms to be selected, SSA stated in FAQ 6.01 the following: "The number of permitted entities selected for the initial rollout will depend on how many permitted entities apply and their anticipated volumes." We believe this is a reasonable approach to ensure the SSA meets the vital funding thresholds necessary to move forward with implementation.

To ensure consumers receive the benefit of the eCBSV's anti-fraud capabilities as quickly as possible, it is imperative that SSA not limit the number of firms selected for the initial rollout to a low number. We believe such a cap would be detrimental to the broad implementation of eCBSV for two reasons. First, SSA has estimated the 50% program startup costs it must collect at \$8.06 million. While there are more than 10,000 financial institutions in the United States, as the application process will likely show, only a small fraction of those will be willing and able to contribute funding to support eCBSV development. Thus, we believe it is in the best interest of this implementation effort and agency cost recovery to accept into the initial rollout those permitted entities that have expressed a clear willingness to contribute financial resources.

Second, rejecting applicants will result in SSA effectively picking those financial providers whose consumers will receive protections under eCBSV and those who will not. We do not believe that choosing between ready and willing users of this anti-fraud tool was the intent of Congress when enacting Section 215. The opportunity to be an early adopter, developing and testing eCBSV integrations in the initial rollout, will give firms selected for the initial rollout a clear advantage in reducing fraud – an edge which should be available to any other applicant similarly situated and prepared. A situation where some prepared applicants are denied access will not only create a "winners and

losers” situation, but will have an impact on overall fraud levels in the financial services ecosystem – to the detriment of all stakeholders.

This should be the case for the full range of permitted entities – service providers and financial institutions alike.

We appreciate SSA’s concerns about managing the scale of the initial and expanded rollouts, and believe the prorated transaction limits SSA intends to apply to the initial rollout will significantly mitigate these concerns. However, capping the number of firms that may participate could lead to an outcome where the \$17.03 million necessary to establish the eCBSV is not collected by SSA because not enough firms choose to participate. As such, we strongly encourage SSA to keep this in mind as it evaluates applications, and to work with industry to ensure companies that are prepared to make this important anti-fraud investment on behalf of American consumers have the opportunity to do so.

Thank you again for your partnership in this process, and we look forward to continuing our work together to make implementation a success.

Sincerely,

American Bankers Association
Better Identity Coalition
Consumer Bankers Association
Consumer Data Industry Association
Consumer First Coalition
United States Chamber of Commerce