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THE CONSUMER REPORTING INDUSTRY

AND THE

INVASION OF PRIVACY

I. STATEMENT OF THE PROBLEM

The problem with which this paper will attempt to deal is the need for personal information in a complex modern society as opposed to the need of every individual to maintain a certain amount of informational privacy. The paper will focus specifically on the practices of consumer reporting agencies in the field of data collection to determine 1) whether there are regular invasions of privacy, 2) whether such invasions, if they occur, are economically necessary or socially desirable, and 3) whether governmental intervention is necessary and the possible forms it could take.

II. SUMMARY OF PRINCIPAL FINDINGS

1. The consumer reporting industry consists of credit bureaus, which gather primarily factual data relating to credit worthiness, and investigative reporting agencies, which gather highly personal information from sources which often prove unreliable.

2. The laws regarding privacy do not prohibit third parties from gathering any type of personal information; therefore consumer reporting agencies do not violate any legal privacy rights in their accumulation of data.

3. The consumer reporting industry does violate a right to privacy when more broadly interpreted as the freedom of the individual to maintain control over information relating to his attitudes, beliefs, behavior, and opinions.

4. Invasions of privacy by investigative reporting agencies are not justified by the use to which the reports are put.

5. Present federal law is deficient in protecting the individual from invasions of privacy by the consumer reporting agencies and should be augmented.

III. POLICY RECOMMENDATIONS

1. Congress should amend the Fair Credit Reporting Act or pass a new law which would regulate the consumer reporting agencies in the following way:

- a. The type of data to be collected should be limited to hard, factual, verifiable information (pp. 18, 19, 20, 27, 30).
- b. The type of enquiries to be made should be limited to consultation of reliable sources in a position to provide authoritative, accurate information. These sources should be disclosed upon the request of the subject of the file (pp.19-20, 30).
- c. The type of data to be collected should be limited to that information which is strictly relevant to the purposes for which the information is being sought (pp. 16-20, 23-24, 27, 30).

2. Consumer Reporting Agencies should be denied the qualified privilege granted them by current legal interpretation and should be held strictly liable for defamatory statements. (pp. 21, 25-26, 30-31).

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V. DISCUSSION

A. Introduction

The consumer reporting industry, as interpreted through the Fair Credit Reporting Act, consists of "organizations whose business is the gathering and reporting of information about consumers for use by others in making a decision concerning whether to grant credit, underwrite insurance, or employ the subject of such reports."¹ Such organizations may be profit-making firms or cooperative associations, and consist primarily of credit bureaus and investigative firms which prepare insurance or employment reports on individuals.

It is important to make a distinction between the two arms of the consumer reporting industry, credit bureaus and investigative agencies. Credit bureaus, for the most part, attempt to maintain a file on each consumer of factual data relating to that individual's credit capacity and credit history. They function primarily as information exchanges between groups of merchants, and their files consist mainly of information supplied by the individual on his credit application, information collected from public records, and information relating to credit history

1. Division of Special Projects, Bureau of Consumer Protection, Federal Trade Commission, Compliance With The Fair Credit Reporting Act, p. 1.

supplied by the merchants themselves.

Investigative reporting agencies, on the other hand, normally house files on only those individuals on whom a report has been requested. Each report request initiates an investigation on the individual. The type of information sought depends on the needs of the requesting firm, but is always more detailed, more personal, and less factual than that supplied by a credit bureau, and is obtained through personal interviews with employers and acquaintances as well as through the examination of written records.

Thus credit bureaus, which emphasize speed and efficiency of reporting, cater primarily to retailers and banks which wish to extend small amounts of credit. Those who require more detailed personal and economic information (e. g. perspective insurers and employers) utilize the services of an investigative reporting agency. It is important to note that in neither case does the consumer know he is being made the subject of a file. Credit bureaus and investigative agencies do not as a rule interview or contact the individual in question.

The consumer reporting industry has traditionally served the informational needs of the business and commercial establishment, and as such has never had to confront the public with its operations. However, the phenomenal recent growth of the industry combined with a new public sensitivity toward

consumer rights has led to recent investigation of the practices and procedures employed by these private data-gathering firms. Consumer advocates, concerned with the harmful effects produced by the misuse of personal information, have begun to raise questions pertaining to the accuracy, accessibility, methods of storage, and dissemination of personal data. This paper will explore the broader and more fundamental problem of the acquisition of such data. Does the collection of personal and credit information constitute an invasion of privacy, in both the legal and the moral senses? If so, how can society's desire for access to such information be reconciled with the individual's desire for personal privacy? Finally, should there be restrictions on the type of information collected or the methods by which it is collected? In order to better understand the implications of these questions, it is necessary to explore more deeply the nature of the consumer reporting industry and its function in the collection of personal data.

B. The Credit Bureau Network

Scope and Purpose

The credit bureau establishment is the more extensive and better known branch of the consumer reporting industry. It began in response to the needs of businessmen in the larger cities who could no longer keep track of the financial worth or reliability of their customers but who found that extending credit was good for business. Today there is

at least one credit bureau in every community and a total of about 2500 throughout the country.¹ At its inception the industry was characterized by localism: local bureaus gathered information on local residents for local merchants.² In fact, throughout the country the size of the credit bureau is almost perfectly correlated to the size of the community it serves.³ Local bureaus are no longer practical. The mobility of today's consumer coupled with the growth of credit buying have created the need for a national network which can readily make available a report on any individual, regardless of his place of residence. Such a network exists today. Of the 2500 local credit bureaus in the United States, almost 2200 belong to an organization known as the Associated Credit Bureaus of American (ACBA), a trade association which facilitates the exchange of information between credit bureaus. Membership in the ACBA enables a local credit bureau to obtain the files of another member cheaply and speedily. Member bureaus serve 400,000 creditors in 36,000 communities, maintain files on 110 million Americans, and issued over 97 million reports in 1967 alone.⁴

It would seem that the computer, which has revolutionized the methods of data storage and transmission, is

1. "The Credit Intelligence Web", The American Federationist, 78, April 1971, p. 9.
 2. Stanton Wheeler, ed., On Record: Files and Dessiers in American Life, p. 147.
 3. Ibid., p. 148.
 4. "The Credit Intelligence Web", op. cit. p. 9.

ideally suited to the functions of credit bureaus. However, the absence of centralized control and a lack of capital have plagued the industry's efforts to modernize.¹ The lack of competition between credit bureaus has also served as an inhibiting factor. Until recently, Savannah, Georgia was the only major city in which two large bureaus were in direct competition.² The emergence of a major computerized credit operation has changed this picture entirely. The Credit Data Corporation, established in 1962, installed the first computerized data system in Los Angeles in 1965, and has since extended its network to San Francisco, New York, Buffalo, Syracuse, Detroit, and Chicago. Bought out by TRW Information Services in 1969, TRW Data, as it is now called, already maintains files on 27 million people, generates another .5 million files each month³, and expects to have a file on every American by 1973.⁴ Spurred on by the efforts of its competitor, the ACBA concluded in 1968 a deal with the International Telephone and Telegraph Company which will enable its members to obtain a packaged system for the buying

1. Stanton Wheeler, op. cit., pp. 149-50.
 2. Ibid., pp. 149-50.
 3. Harry C. Jordan, testimony before the Subcommittee on Financial Institutions of the Senate Committee on Banking and Currency, May 21, 1969, in U.S. 91st Congress, 1st Session, Senate Committee on Banking and Currency, Subcommittee on Financial Institutions, Fair Credit Reporting, p. 227.
 4. Harry C. Jordan, testimony before the House Special Subcommittee on the Invasion of Privacy of the Committee on Government Operations, March 13, 1968, in U.S. 90th Congress, 2nd Session, House Committee on Government Operations, Special Subcommittee on the Invasion of Privacy, Commercial Credit Bureaus, p. 68.

and leasing of computer equipment.¹

The credit bureau industry has thus become part of what Arthur F. Miller refers to as a "nationwide information exchange system."² It is now possible for a commercial subscriber of TRW Data's services to obtain credit information on an individual in TRW's computerized files by phone in two minutes.³ It will eventually be possible to obtain all credit bureau files in this manner. Does the existence of such a system constitute an invasion of personal privacy?

Credit Bureaus and Privacy

In order to determine whether the accumulation of data by credit bureaus constitutes an invasion of privacy, two aspects of data accumulation must be examined. The first is the type of information collected, and the second is the methods employed to collect such information. A typical credit bureau will compile information in the following categories: 1) identifying information, including name, address, marital status, name of spouse, and social security number; 2) present employment, including employer, length of employment, position held, and monthly income; 3) personal history, including birth date,

1. Arthur F. Miller, The Assault on Privacy: Computers, Data Banks, and Dossiers, p. 75.

2. "The Credit Intelligence Web", op. cit., p. 8.

3. Harry C. Jordan, testimony before the House Committee on Government Operations, Special Subcommittee on the Invasion of Privacy, March 13, 1968, in U.S. 90th Congress, 2nd Session, House Committee on Government Operations, Special Subcommittee on the Invasion of Privacy, op. cit. p. 68.

number of dependents, former address, previous employment and income; 4) information from public records and newspapers, including suits judgements, tax liens, bankruptcy filing, indictment or conviction for a criminal offense, and marital separation or divorce; 5) credit history, including type, disposition, and manner of payment of accounts with retail businesses and banks.¹

Present law gives the individual protection against "public disclosure of private facts" under two conditions only. First, that information must be of an intimate nature, not available to those who inspect public records open to the public. Second, in order for disclosure to constitute an invasion of privacy, that "intimate information" must be disclosed widely, to the public or at least a large group.²

The information gathered by credit bureaus, while it is personal, can hardly be termed intimate. It is contained both in public records and in the files of any banks or stores with whom the individual conducts business. Neither does the credit bureau disseminate information to the public. The information is purchased by those with a business interest in it.

Most credit bureaus, then, do not abridge any legal right to privacy. Whether they violate a more broadly inter-

1. Stanton Wheeler, ed., op. cit., p. 157.
 2. Kenneth L. Karst, "'The Files': Legal Controls Over the Accuracy and Accessibility of Stored Data" in Law and Contemporary Problems, 31, Spring 1966, p. 346.

puted right to privacy, however, deserves further consideration.

Privacy has been defined in many ways for many different purposes, but in general terms the essence of privacy can be stated simply as the "freedom of the individual to pick and choose for himself the time and circumstances under which, and most importantly, the extent to which, his attitudes, beliefs, behavior, and opinions are to be shared or withheld from others." 15 In the strictest sense, a credit bureau, which carries on its operations without the consent (or, in most cases, knowledge) of the individuals concerned, does violate this freedom. It does so especially in regard to the second aspect of its operation: the method of data collection.

A credit bureau file is initiated in one of two ways. Since the aim of every credit bureau is the maintenance of a complete set of files, the more efficient and enterprising ^{bureaus} will attempt to add names to their files by checking through newspapers, public records, or even telephone books. Otherwise, a credit bureau file is initiated on the request of the individual or firm to whom an application for credit is made. A consumer applying for credit fills out an application for credit on which he provides his name, address, employer, and one or two credit references (such as a bank or department store which has extended credit to him). The potential

1. Ruebenhausen, Oscar M., and Orville G. Brim, Jr., "Privacy and Behavioral Research", reprinted in U.S. 89th Congress, 1st Session, Subcommittee of the House Committee on Government Operations, Special Inquiry on Invasion of Privacy, p. 365.

credit granter forwards this information to the credit bureau, and asks for a credit report on the individual. If the individual has never applied for any type of credit and the credit bureau has not ^{already} obtained his name through other means, it will open a file on him and assign to its clerks the job of compiling credit information. In neither case, however, does the consumer ever give his consent for a credit check. The consent may be implied by the fact that the applicant applies for credit, but it is never stated, and many if not most individuals seem unaware of the extent to which information on them is gathered. In fact, the credit bureau has traditionally demonstrated that it is loathe to deal with the subjects of its files. Rather, it works through the consumer without his knowledge, using the information provided by him on his credit application to run a complete credit check.

First, the credit bureau contacts the employer, both to verify employment and to obtain the employment information described previously. ¹⁶ Secondly, it contacts the credit references supplied by the individual to fill in the "credit history" section of the file. ¹⁷ Such information consists of the type of account and the date opened, the date of last sale, the highest credit extended, present amount outstanding, amount past due, and the usual manner of payment (reported in terms such as "fast pay", "slow pay", or

1. See Appendix for sample "employment verification" form.
 2. See Appendix for sample credit check form and "Confidential Factbilt Report".

"delinquent")¹. Most credit granters, in order to obtain credit reports at a discount, become members of the local credit bureau, and are therefore obligated by contract to supply it with such information.² Firms which are not members are usually equally willing to provide the information, however, as they too have occasion to purchase credit bureau reports and appreciate the necessity of obtaining credit information.

Credit bureaus next check the public records for information which might affect credit worthiness, such as record of a tax lien or bankruptcy filing. However, they also gather seemingly irrelevant data, such as records of marriage, divorce, or separation; voter registration; or automobile registration.³

In addition, some of the less circumspect credit bureaus engage in deceptive forms of information collection. Especially in ^a small town, a credit bureau may operate a "Welcome Wagen" or "Welcome Newcomer" service. A local housewife from one of these agencies will call on a new resident ostensibly to offer greetings and give helpful

1. Interview with Marshall Reper, Washington D.C., Nov. 1, 1971.
 2. Though credit reports are fairly inexpensive (prices range from \$.50 to \$4.00), a large credit granter can save money by becoming a member of the credit bureau for a fee of about \$60.00. On becoming a member the credit granter assumes the obligation of reporting on consumer transactions. For example, the members of the Credit Bureau, Inc. of Washington, D.C. requires its members "to furnish complete information concerning its customers" and charges a membership fee of \$62.00. (See note above for source).
 3. "The Credit Intelligence Web", op. cit., p. 13.

information as to the location of the nearest supermarket or library, but will in reality be sizing up the credit needs or worth of the new family for the local merchants.¹

Conclusions

Thus it is possible to conclude that while credit neither bureaus gather information of a highly sensitive nature nor violate any existing laws of privacy, they do violate a broad and widely accepted definition of privacy: the freedom of an individual to control the dissemination of information about him. However, it is clear that the benefits of credit reporting outweigh for most individuals the value of privacy over the type of information gathered by credit bureaus.

It is estimated that fully 60% of the average American's net income is spent on credit purchases of some form.² For many, credit is simply a convenience. For others it constitutes a crucial necessity. The purchase of cars, homes, educations, and vacations, as well as television sets refrigerators, and other goods are made not only convenient but possible through the extension of credit.³ Of all people seeking credit, approximately 90% pay on time, 5% pay more slowly than the terms agreed upon for payment, and approximately 5% are delinquent. Businesses have a right to attempt to protect themselves from losses incurred in this way. Since such

1. "The Credit Intelligence Web", op. cit., p. 10.

2. Alan F. Westin, testimony before the Special Subcommittee on the Invasion of Privacy of the House Committee on Government Operations, March 12, 1968, in U.S. 90th Congress, 2nd Session, House Committee on Government Operations, Special Subcommittee on the Invasion of Privacy, op. cit., p. 5.

3. Ibid., p. 5.

losses are inevitably passed on to the consumer, it seems that the credit reporting system also works to the advantage of the consumer. Americans should not and need not be forced to give up their personal privacy to obtain credit. However, in order to propose any meaningful solutions to the invasion of privacy by credit bureaus, it is necessary to examine more thoroughly the practices employed by the agencies in the investigative branch of the consumer reporting industry.

B. Investigative Reporting Agencies

Scope and Purpose

The investigative branch of the consumer reporting industry has received less attention than the credit reporting branch because most consumers are ^{unaware} of both its existence and its effect on them. It consists primarily of firms which prepare reports on applicants for insurance and employment. Retail Credit Company and Hooper Holmes Agency are the two giants of the industry.

Retail Credit Company, which is said to control 60% of the investigative reporting market, is headquartered in Atlanta and maintains files on forty-eight million businesses and individuals in North America. Its subsidiary, Retailer's Commercial Agency, Inc., provides detailed credit information on applicants for home mortgages, and it is also affiliated with sixty-three local credit bureaus which belong to the ACBA. The bulk (83%) of its business is consumed by the

preparation of reports for the purposes of insurance underwriting, claim handling, and employee selection, and is divided equally between life/health and property/casualty companies. Employment reports constitute about 10% of business volume, credit reports 6%, and market research 1%. It compiles approximately twenty million new files a year, charging from one to one thousand dollars per report.¹ Alan F. Westin estimates that out of the approximately thirty-five million employment checks per year, 175,000 produce unfavorable information.²

The Hooper-Helms Agency Does similar work on a smaller scale, but concentrates on exclusively derogatory information. It maintains a file of derogatory data on more than ten million individuals.³

In 1968 twelve to fifteen per cent of the total dollar volume spent on inspection reports went to the American Service Bureau, a profit-making agency originally set up and supported by one of the life insurance trade associations.⁴

The Medical Information Bureau is a non-profit inter-company index the members of which write over ninety per cent of all the life insurance written in the United States and

1. Unless otherwise noted, the information in this paragraph is from the testimony of W. Lee Burge before the House Banking and Currency Committee, Subcommittee on Consumer Affairs, Fair Credit Reporting, pp. 473-4, 503.

2. Alan F. Westin, "The Credit Networks: Detour to 1984", The Nation, June 1, 1970, reprinted in ibid., p. 638.

3. Ibid., p. 634.

4. Ibid.

Canada.¹ It maintains files with medical information on over eleven million people, including everyone who has ever tried to purchase life insurance in these two countries, and adds more than 10,000 additional reports a day through its 703² members.

The American Security Council, does reporting of a different sort. While it does not engage in any field investigations, it collects names from newspapers, books, magazines, and any other available printed matter to add to its collection of over one million names of allegedly subversive individuals and organizations. Founded in 1955 by a former FBI agent, the ASC provides its 3,200 members (as of 1963) with information on anyone with left-wing associations.³

The Church League of America provides a similar mostly service to its subscribers, government agencies and defense contractors. Granted tax-exempt status in 1942 on an "educational basis", the League is supported by tax-exempt contributions and boasts that "Our files are the most reliable, comprehensible, and complete, and second only to those of the FBI, which, of course, are not available to you." The League, whose avowed purpose is to determine the "philos-

1. Andrew C. Webster, testimony before the Subcommittee on Financial Institutions of the Senate Committee on Banking and Currency, May 22, 1969, in U.S. 91st Congress, 1st Session, Senate Committee on Banking and Currency, Subcommittee on Financial Institutions, Fair Credit Reporting, p. 297.

2. "The Credit Intelligence Web", op. cit. p. 10.

3. Myron Brenton, op. cit., p. 76.

ephy of life'" of employment applicants, in 1962 had "'five tens of files'" consisting of 850,000 cross-referenced index cards on "organizations and individuals who have 'aided the cause of subversion'".¹⁰

These, then, are the investigative services provided by the best-known consumer reporting agencies. On and for whom do they make their reports? Myron Brenton estimates that at least three-fourths of all U.S. insurance policy-holders are fully checked without their knowledge by an investigative agency before the issuance of their policy takes place.² This estimation is corroborated by another study which points out that approximately five-sixths of all U.S. families held some form of life insurance, and except in cases where a very small policy is a issue, the applicants are routinely investigated.³

Life insurance holders are not the only group being subjected to investigation. The other fields of insurance, auto insurance, health insurance, property insurance, and liability insurance, make equal use of the services of investigative agencies. Over eighty-five per cent of the cars in the U.S.

1. Alan F. Westin, testimony before the Subcommittee on Consumer Affairs of the House Committee on Banking and Currency, March 17, 1970, including excerpts from a letter sent by the Church League of America to a large, Eastern department store, in U.S. 91st Congress, 2nd Session, House Committee on Banking and Currency, Subcommittee on Consumer Affairs, op. cit., pp. 62-3.
2. Myron Brenton, The Privacy Invaders, p. 45.
3. H. Laurence Ross, "Personal Information in Insurance Files", in Stanton Wheeler, op. cit. p. 203.

are covered by such liability insurance, and over ninety per cent of the homes by fire insurance and related coverages.¹ In addition, employers make frequent use of the services of investigative agencies to discover the background of potential employees.

In both cases the purposes of such investigations appear to be twofold: first, to verify information supplied by the subject himself, and second, to obtain information the subject would probably not divulge, at least in the "objective" manner required, which insurers and employers deem necessary to evaluate the risk involved in either employing or insuring an individual.

In the case of insurance, the type of information is utilized first, to determine whether to accept or reject an applicant, and second, to match the premium to the perceived risks.² Because insurers base their decisions regarding an applicant on statistical predictions, they must collect enough information to be able to place an applicant accurately in one of the many risk categories.³

Increasingly, the act of hiring a new employee has also become an investment with a substantial degree of risk involved. Not only does the cost of training workers continue to increase, but union contracts can in many instances make

1. H. Laurence Ross, "Personal Information in Insurance Files", in Stanton Wheeler, ed., *op. cit.*, p. 203.

2. *Ibid.*, p. 203

3. Interview with Mark Silbergeld, Nov. 2, 1971.

it very difficult to fire an employee. In addition, many contracts contain so much in the way of insurance benefits, pensions, and extras that once a firm has agreed to employ an individual it incurs a substantial financial obligation whether or not that individual performs satisfactorily.¹

Corporate employees may be investigated for additional reasons. Firms which engage in classified work under government contract may seek to ascertain the political loyalties of employees. Other firms investigate an employee's background to make certain he has no interest in violating trade secrets.² Thus the decision to employ takes on the ramifications of any other investment decision and must be researched with the same degree of thoroughness.

These investigations, however, must be evaluated not only in terms of the perceived needs of employers and insurers, but also in terms of the needs and rights of individual citizens. Do these investigations invade individual privacy, and is any invasion either essential for the purposes stated or justifiable in terms of any individual right to privacy? These questions must be answered through an examination of the methods of data collection employed by the investigative agencies.

1. Myron Brenton, The Privacy Invaders, p. 63.
 2. Ivar Berg and James Salvate, "Record Keeping and Corporate Employees", in Stanton Wheeler, ed. op. cit., pp. 178-9.

Type of Information Collected

The type of information contained in an investigative file varies with the purpose for which it is compiled.

A life insurance investigation typically contains the following information: 1) Corroboration of an applicant's declarations, including name, address, date of birth, occupation, employer; 2) health history, including dates and descriptions of major illnesses and operations, family health history, and description of personal appearance; 4) description of habits, especially drinking habits, including frequency of liquor consumption, type of liquor consumed, reasons for drinking; 5) descriptions of avocations, including participation in hazardous sports such as flying skiing, scuba diving, racing, mountain climbing, cave exploring or sky diving; 6) description of environment, including neatness of home, amount of crime in neighborhood, physical conditions of home and neighborhood; 7) reputation, including marital status, type of associates, and home, social, and club life.¹

In addition to the detailed information provided in an investigative report, a life insurance applicant must sign a medical authorization releasing relevant information in the hands of doctors and hospitals and must undergo an examination by the insurance company's physician.²

1. See Appendix for Retail Credit Company Life Report, Special Narrative Life Report, and Special Life Report.

2. H. Laurence Ross, "Personal Information in Insurance Files" in Stanton Wheeler, ed., op.cit., p.206.

The results of the examination are likely to find their way into the files of the Medical Information Bureau, as all the members are bound by rule to report in code any of the 223 medical impairments and twelve supplemental non-medical impairments on the bureau's list.¹ The supplemental impairments include "nonconformity" (explained as unusual drinking or drug habits), "insurance hazard" (sexual deviates are noted here), "finances or speculation", "foreign residence or travel", and "other information".²

The investigative agencies thus make no attempt to confine themselves to hard data or "public facts", as do the credit bureaus. They violate much more seriously than do credit bureaus "the freedom of the individual to pick and choose for himself the time and circumstances under which, and most importantly, the extent to which, his attitudes, beliefs, behavior, and opinions are to be shared or withheld from others."³

While ^{some of} the medical information in the MIB files is likely to be first-hand information, the data in the "supplemental" category and the data in most of the investigative reports is hearsay, gleaned from interviews with neighbors, former neighbors, employers, landlords, friends, business associates, fellow club members, and other acquaintances of the applicant.⁴

1. Ibid., p. 209.

2. Ibid., p.209-10.

3. Oscar M. Ruebenhausen and Orville G. Brim, Jr., "Privacy and Behavioral Research", reprinted in U.S. 89th Congress, 1st Session, Subcommittee of the House Committee on Government Operations, Special Inquiry on Invasion of Privacy, p. 365.

4. Arthur F. Miller, op. cit., pp. 69-70.

Indeed, it is impossible to gather such personal information in any other way. Since the investigative agencies neither engage in surveillance nor interview the subject of their reports, they have no choice but to glean the information required of them from those closest to the subject. Thus the type of information sought is dangerous not only because it constitutes an undue invasion of privacy, but also because it cannot really be compiled accurately.

The Retail Credit Company "Manager's Manual" gives an accurate picture of the quality of the information collected, advising its managers that

When customers wish to use our reports, other than a claim, as evidence in a suit, try to forestall this by explaining that court after court has ruled that inspection reports are not admissible as evidence because they are compiled from hearsay information.¹

Arthur R. Miller points out the unfortunate results of such procedures:

Given interrogation practices designed to provoke gossip, it is not surprising that files produced during several congressional hearings contained comments from unidentified sources such as "peculiar", "Scatter-brained", "neurotic", "psychotic", and "has... a persecution complex." None of these remarks appears to have had any medical or psychiatric basis. Other files included remarks about the subject's drinking, aggressiveness, ethics, associations, health, hobbies, and activities. To what extent conscious or unconscious ethnic, racial, and religious prejudices, let alone personal antagonisms shape the tone and content of these reports is impossible to determine.²

1. Quoted by Senator Proxmire in U.S. 91st Congress, 1st Session, Senate Committee on Banking And Currency, Subcommittee on Financial Institutions, op. cit., pp. 193-4.

2. Alan F. Westin, "The Career Killers", Playboy, June 1970, reprinted in U.S. 91st Congress, 2nd Session, Subcommittee on Consumer Affairs of the House Banking and Currency Committee, op. cit., p. 636.

Not only are the reports compiled of hearsay and gossip, they are compiled under conditions which all but insure that they will be inaccurate. Of the personnel at Retail Credit Company, the largest of the agencies, only twenty per cent have a college degree. Sixty per cent are drop-outs and twenty per cent have never attended college.¹ These employees, paid an average of \$7,000 to \$10,000 a year, are expected to complete twelve to sixteen detailed written reports per day, each consisting of at least two to ten interviews.² A former investigator from Retail Credit admitted that "the pressure of the production quota system is so great that an inspector cannot take the time to 'reconfirm old file material before including it on a new investigation', as company procedures require."³

In addition to production quotas, most investigative firms have quotas on derogatory information. American Service Bureau expects its investigators to turn in negative reports on fourteen per cent of their assignments;⁴ Retail Credit Com-

1. W. Lee Burge, testimony before the Special Subcommittee on the Invasion of Privacy of the Committee on Government Operations, May 16, 1968, in U.S. Congress, 2nd Session, House Committee on Government Operations, Special Subcommittee on the Invasion of Privacy, Retail Credit Co. of Atlanta, Ga., p. 19.
 2. Alan F. Westin, "The Career Killers", op. cit., p. 636.
 3. Letter to Senator William Proxmire from American Service Bureau, June 4, 1969, reprinted in U.S. 91st Congress, 1st Session, Senate Committee on Banking And Currency, Subcommittee on Financial Institutions, op. cit. p. 297.
 4. U.S. 91st Congress, 1st Session, Senate Committee on Banking And Currency, Subcommittee on Financial Institutions, op. cit., p. 186.

pany is more stringent, with a quota of fifteen per cent. In fact, the Manager's Manual expressly states that

Each inspector keeps a record of significant information cases on a form 930 for each day. These forms should be reviewed regularly through the month to be sure that all inspectors are developing a reasonable percentage of significant data.¹

Utilization of Reports

The present use to which the information is put hardly seems to justify the type of investigation being conducted. Melvin Stark, Manager of the Washington Office of the American Insurance Association, has testified that "barely 1% of the risks involved could have been canceled or nonrenewed on the basis of information received from credit reporting agencies."²

The information is used primarily not to decline applicants but to set premiums appropriate to the perceived risks. The following characteristics are claimed to indicate a "higher than average loss potential": prior accidents, excessive use of alcohol, undesirable driving habits, financial irresponsibility, adverse environment, prior traffic violations, peer morals, and unstable employment.³ This type of information, however, is precisely that which is most sensitive and personal. In addition, the number of applicants accepted does

1. Melvin L. Stark, testimony before the Subcommittee on Consumer Affairs of the House Committee on Banking and Currency, April 7, 1970, in U.S. 91st Congress, 2nd Session, House Committee on Banking and Currency, Subcommittee on Consumer Affairs, op. cit., p. 514.

2. Ibid., p. 515.

not seem to justify the subjection of all insurance applicants to the invasions of privacy which completion of most of the report forms entails. A 1967 survey by the Institute of Life Insurance found that only 3% of all "ordinary" life insurance applicants were rejected, while 6% were assigned high premiums and 91% were approved at standard rates.¹

The extent to which employers utilize investigative reports is not quite so well documented. The only available data, in a study by the National Industrial Conference Board, in 1965, shows that an average of 34% of all businesses utilized investigative reports in making employment decisions.² The overwhelming majority of business concerns rely primarily on the references of former employers rather than on investigative reports.³ It is not clear, then, that the use to which these reports are put justifies the invasions of privacy they entail.

C. Consumer Reporting Agencies And The Law

It has been shown that the consequences of the type of information collection perpetrated by the investigative agencies is not only an undue invasion of privacy but also the compli-

1. Charles N. Walker, testimony before the Subcommittee on Consumer Affairs of the House Committee on Banking and Currency, April 7, 1970, in U.S. 91st Congress, 2nd Session, House Committee on Banking and Currency, Subcommittee on Consumer Affairs, op. cit., p. 509.

2. Ivar Berg and James Salvate, "Record-Keeping and Corporate Employees", Stanton Wheeler, op. cit., p. 186.

3. Ibid., p. 186.

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lation of dangerously inaccurate files. Credit bureaus invade privacy with less serious consequences. The present dearth of law, however, serves only to insulate these agencies from criticism. First, there is currently no statutory limitation on or even regulation of the type of information which consumer reporting agencies may acquire. Such a limitation was proposed in both the House and Senate versions of what eventually became the Fair Credit Reporting Act. Section 54 of HR 16340 proposed that "No consumer reporting agency may report information which is not reasonably relevant to the purpose for which it is sought or which constitutes an undue invasion of privacy."¹ Section 164 of the comparable bill in the Senate also sought

To limit the collection, retention, or furnishing of information bearing upon the credit rating of any individual to those items essential for the purposes for which the information is sought and to preclude the collection, retention, or furnishing of information which only marginally benefits the purposes for which the information is sought or which represents an undue invasion of the individual right to privacy.²

The final version of the Fair Credit Reporting Act contains no such provisions. That is not surprising, however,

1. Text of Hr 16340, 91st Congress, Second Session, reprinted in U.S. 91st Congress, 2nd Session, House Committee on Banking and Currency, Subcommittee on Consumer Affairs, op. cit., p. 9.

2. Text of S. 283, 91st Congress, 1st Session, reprinted in U. S. 91st Congress, 1st Session, Senate Committee on Banking and Currency, Subcommittee on Financial Institutions, op. cit., p. 7.

considering the fact that, in the words of an attorney for the Federal Trade Commission (which is in charge of enforcing the law), it was a 'last minute compromise written in a hotel room.' He further criticized the Act as not only incomplete in scope but also "abominably drawn".¹

Though the Act does for the first time give consumers the right to be informed of the fact that an investigation is being made, it does so only after the fact and thus does not give the consumer the chance to prevent the investigation. The Act's major contributions are the provisions for 1) notifying the individual of the initiation of an investigative report, 2) allowing the consumer to make corrections of disputed items, and 3) giving the consumer access to the report at any time.² The Act fails, however, to define either any right of privacy or any guidelines as to the type of information which should be collected and that which should not be collected.

The law is deficient in other respects as well. Consumer reporting agencies are protected from defamation suits by a qualified privilege to make a defamatory statement based on the fact that "the credit bureau is performing a necessary and useful business which benefits those who have a legitimate interest in the [information]."³

1. Interview with Jack E. Kahn, Nov. 1, 1971.
 2. See U.S. 91st Congress, PL 91-508, Title VI, The Fair Credit Reporting Act, (84 Stat. 1127-1136, 15 U.S.C. 1601 et seq.).
 3. "Credit Investigations and the Right to Privacy; Quest for a Remedy", in Georgetown Law Journal, 57:3, Feb. 1969.

The subject of the report thus has no recourse against the credit bureau, regardless of the falsity of the information.¹

In the words of Alan F. Westin:

The leading cases held that credit bureaus can

1. Ibid., Reprinted in U.S. 90th Congress, 2nd Session, Special Subcommittee on Invasion of Privacy of the Senate Committee on Government Operations, Retail Credit Co. of Atlanta, Ga., p. 60.

circulate information to participating credit grantors and that they are privileged in this reporting against suits for libel or defamation if the reports were furnished in good faith to someone with a legitimate interest.¹

Until very recently even the sources of information were completely shielded from any disclosure or retributive action on the part of the consumer. The Fair Credit Reporting Act now enables consumers to learn the source of information, though only through a suit.²

D. Conclusions

Present law is thus pitifully inadequate to deal with the problems posed by the work of the consumer reporting agencies. It solves neither the problems of invasion of privacy nor the problems of innaccuracy resulting from the type of data required and the methods employed to gather that data. It is clear that the collection of certain types of data results not only in an invasion of privacy, but also in the compilation of files containing unreliable data. It may be possible to argue that the invasion of privacy is a necessary evil which serves the decision-makers of the society. However, if the invasion of privacy results in only hearsay information,

1. Alan F. Westin, testimony before the Special Subcommittee on the Invasion of Privacy of the House Committee on Government Operations, March 12, 1968, in U.S. 90th Congress, 2nd Session, House Committee on Government Operations, Subcommittee on Invasion of Privacy, Commercial Credit Bureaus, p. 13.

2. U.S. 91st Congress, PL 91-508, Title VI, The Fair Credit Reporting Act, op. cit., section 609.

it can only detract from the ^{rationality} rationality of the decision-making process and cause irreparable harm to those on whom the decisions are made.

The law is particularly inadequate in view of the future problems likely to be posed by widespread computerization of the consumer reporting industry operations. The problems posed by the computer in this field are twofold. First, it tends to lend respectability to even the most unreliable sorts of information. Hearsay, especially if reported in computer language or code, becomes "data". Congressman Cornelius Gallagher has accurately asserted that though the widespread saying among computer experts is "garbage in-garbage out", the effect of computerized files has more nearly been that "If it's garbage when it goes in it's gospel when it comes out."¹ Information is thus enhanced by the printout.

Second, the computer makes data storage cheaper and easier. Once the original sum required for computerization is invested, the collection and storage of more types of data becomes not only easier but also more economical.² Arthur F. Miller sums up well the problems posed by computerization:

Thus computerization, networking, and reduced competition are bound to mire the credit information industry even more deeply in the morass of the privacy problem... the capabilities of the new technology will encourage credit bureaus to

1. NBC Program, "Second Sunday", May 11, 1969, transcript reprinted in U.S. 91st Congress, 1st Session, Senate Committee on Banking and Currency, Subcommittee on Financial Institutions, op. cit., p. 557.

2. Kenneth L. Karst, op. cit. p. 361. See A

acquire more information of a more sensitive nature about individual and institutional borrowers than they have in the past. Concomitantly, given the massive investment required to computerize a large credit data base and a Bureau's ability to use the technology to manipulate information in unique ways, the temptation to use the data for non-credit-granting purposes will be difficult to resist... Thus there is a re

The solution to the privacy problem posed by the consumer reporting industry, however, does not lie in granting the individual a strict property right over personal information.² Though such action would grant an individual both the control over personal information and the legal protection which is currently lacking, its implementation would present many problems. First, from a purely practical standpoint, the collection of personal information by private industry is already a fait accompli. It would be almost impossible to prevent entirely the collection of many types of factual, though personal, information now required by industry. Furthermore, it is the consumer reporting industry which confers a commercial value on such information by compiling it and making it easily accessible. It would be inequitable to give the individual full legal rights over such information.³ Finally, and most importantly, however, is the fact that giving the individual a legal right to personal information would place on him the responsibility of protecting his own interests through private action, which would be time-consuming and expensive. Giving rights to individuals

1. Arthur F. Miller, op. cit., pp. 79-80.
 2. Ibid., pp. 212-213.
 3. Ibid., pp. 212-213.

would thus be an inefficient way of regulating information collection. Furthermore, individuals could easily be persuaded to waive their rights by consenting to release such information in return for the benefits conferred by the ability to obtain credit or purchase auto insurance or find employment. Their bargaining power in such a situation would be minimal, as they have no benefits to confer by withholding information and much to lose.¹

Government regulation would thus seem to be a more efficient and feasible solution. It could provide enforceable guidelines which would have the effect of giving the individual greater control over personal information. As Arthur F. Miller points out,

Congressional intervention could afford immediate protection to the individuals in contexts in which none presently exists, provide a uniform and comprehensive formula for the development of multistate computer systems, and infuse a measure of coherence into the presently amorphous and archaic law of privacy.²

Any new law attempting to deal with the problems of privacy invasion by the consumer reporting industry should embody the following elements. First, the law should limit the type of data which can be assembled in any given file to factual, verifiable, "hard" data such as identifying information, financial data, occupational information, health history, and

1. Arthur F. Miller, op. cit., p. 29.
 2. Ibid. pp. 220-221.

driving record. Subjective judgments relating to information falling under these headings should be eliminated. For example, questions relating to the subject's appearance or his personal habits should not be included under the "health history" section of a report. Neither should the law allow, even under these headings, the collection of information which constitutes an undue invasion of privacy, such as information regarding environment, reputation, morals, or political beliefs. Such a provision might force insurance companies to alter their decision-making processes somewhat. However, the present use to which such information is put hardly seems to justify its collection.

Second, to insure the accuracy of the information collected, the law should limit the type of enquiries which can be made to authoritative sources, such as employers, doctors, and public records. If an insurance company needs to know an individual's driving habits, for example, it need only check his record of convictions for traffic violations. If that company wants a person's health history, it should consult his personal physician. It should not be permitted to ask his neighbor or fellow club member for such information.

To make enforcement of this provision more effective and to provide the subject of the file with a meaningful opportunity to challenge the accuracy of any information, the consumer reporting agencies should be required to disclose the sources of any information which is disputed by the subject.

This regulation would permit the consumer to have access to the credit bureau's sources only if he cannot resolve a disputed item with the credit bureau.¹ It would thus prevent the random revelation of sources and would also have the side effect of upgrading the types of sources utilized by the consumer reporting agencies. Arthur F. Miller effectively states the case for such a provision:

Now, in the situations in which a man feels truly aggrieved by the file and the file contains investigative material and he sees that he has been branded a psychotic or neurotic and has no way of knowing whether he has been branded that by his family doctor, or by his neighbor down the hall with whom he had a long dispute over the garbage in the back yard, or by someone at the office, it seems to me that this is precisely the point at which the individual is justified in demanding to know the source.

I also think it is precisely the time when the bureau is not justified in screening out the source. A source that has been honest probably needs no protection; one that has been deceitful deserves no protection.²

Third, to further insure that only certain types of information are collected, the law should include a strict relevancy requirement such as those already proposed and mentioned earlier in this study. Such a requirement would

1. Testimony of Arthur F. Miller, May 23, 1969, in U.S. 91st Congress, 1st Session, Subcommittee on Financial Institutions of the Senate Committee on Banking and Currency, Fair Credit Reporting, p. 365.

2. Testimony by Arthur F. Miller, March 20, 1970, in U.S. 91st Congress, 2nd Session, Subcommittee on Consumer Affairs of the House Committee on Banking and Currency, Fair Credit Reporting, p. 198.

help prevent the indiscriminate collection of all available data on an individual and limit such collection to the essential facts necessary to make a given decision. Relevancy would be determined by the agency enforcing the provision (in this case the Federal Trade Commission) for the simple reason that no lawmaker could determine in advance what might or might not be relevant in a given file. An agency with experience in dealing with the consumer reporting agencies and their use of files would be a better judge of exactly what information would be relevant and what would constitute an undue invasion of privacy. Admittedly this would be a difficult task, but it is one that must be accomplished in order to prevent the inclusion of a section on habits or political beliefs from appearing on a health insurance or employment report form.

~~make any given decision.~~

Finally, to enable individuals to claim damages through private action, present law concerning privacy should be reinterpreted to deny the conditional privilege now awarded credit reporting agencies. Denial of privilege would make credit bureaus strictly liable for defamatory statements.¹ It would thus not only force credit bureaus to adopt more reliable procedures, it would enable the individual to obtain retribution through the collection of damages in cases where government regulation has failed to promote strict adherence to new laws.²

It may be argued that the enactment of such proposals would only regulate current invasions of privacy rather than prevent them, and that the government should simply outlaw the collection of personal information. It seems fairly clear, however, that the consumer reporting industry cannot be made to disappear overnight. Neither is it likely that the present demand for information will disappear. Rather, it will increase as information collection becomes easier and more profitable. A balance must be sought between industry's need for information and the individual's need for informa-

1. Credit Investigations and the Right to Privacy: Quest for A Remedy", Georgetown Law Journal, 57, Feb 1969, reprinted in U.S. 90th Congress, 2nd Session, House Committee on Government Operations, Special Subcommittee on the Invasion of Privacy, op. cit., p. 64.

2. Interviews with Jack E. Kahn, Ken Maclean, and Mark Silbergeld, on Nov 1 and 2, 1971, were especially helpful in arriving at these recommendations.

tional privacy. The proposals outlined here attempt to strike such a balance through strict control of the type of information which the consumer reporting agency may collect.

APPENDIX

THE CREDIT BUREAU, INC.
 222 Sixth Street, N.W. Washington, D. C. 20013
 Telephone: NAtional 8-0680 (202)

SUMMARY REPORT SINGLE REFERENCE TRADE REPORT
 SHORT REPORT FULL REPORT PREV. RES. REPORT

DATE RECEIVED	DATE MAILED	CBR REPORT NO.
DATE TRADE CLEARED	DATE EMPLOY VERIFIED	INCOME VERIFIED <input type="checkbox"/> YES <input type="checkbox"/> NO

CONFIDENTIAL Factbill® REPORT

This information is furnished in response to an inquiry for the purpose of evaluating credit risks. It has been obtained from sources deemed reliable, the accuracy of which this organization does not guarantee. The inquirer has agreed to indemnify the reporting bureau for any damage arising from misuse of this information, and this report is furnished in reliance upon that indemnity. It must be held in strict confidence, and must not be revealed to the subject reported on.

REPORT ON (SURNAME): _____ MR., MRS., MISS: _____ GIVEN NAME: _____ SOCIAL SECURITY NUMBER: _____ SPOUSE'S NAME: _____
 ADDRESS: _____ CITY: _____ STATE: _____ ZIP CODE: _____ SPOUSE'S SOCIAL SECURITY NO.: _____

COMPLETE TO HERE FOR TRADE REPORT AND SKIP TO CREDIT HISTORY
 PRESENT EMPLOYER AND KIND OF BUSINESS: _____ POSITION HELD: _____ SINCE: _____ MONTHLY INCOME: \$ _____

COMPLETE TO HERE FOR SHORT REPORT AND SUMMARY REPORT AND SKIP TO CREDIT HISTORY
 DATE OF BIRTH: _____ NUMBER OF DEPENDENTS INCLUDING SPOUSE: _____ OWNS OR BUYING HOME RENTS HOME

FORMER ADDRESS: _____ CITY: _____ STATE: _____ FROM: _____ TO: _____
 FORMER EMPLOYER AND KIND OF BUSINESS: _____ POSITION HELD: _____ FROM: _____ TO: _____ MONTHLY INCOME: \$ _____
 SPOUSE'S EMPLOYER AND KIND OF BUSINESS: _____ POSITION HELD: _____ SINCE: _____ MONTHLY INCOME: \$ _____

CREDIT HISTORY (Complete this section for all reports)

KIND OF BUSINESS	DATE ACCOUNT OPENED	DATE OF LAST SALE	HIGHEST CREDIT	AMOUNT OWING	AMOUNT PAST DUE	TERMS OF SALE AND USUAL MANNER OF PAYMENT

PUBLIC RECORD AND/OR SUMMARY OF OTHER TRADE INFORMATION:

[Handwritten Signature]



PLEASE RETURN QUICK



Date
Name
Wife's Name
Address
Formerly

Date Opened _____
Last Purchase _____
High Credit _____
Balance Owning _____
Amount Past Due _____
Terms and Paying Habits _____
(Give Code)
Remarks _____

THE CREDIT BUREAU, INC.
222 SIXTH STREET, N.W.
WASHINGTON, D. C. 20013

EMPLOYMENT VERIFICATION
THE CREDIT BUREAU, INC.

Code No. _____ Date _____
Name _____
Address _____

Employer _____
Bureau and/or Address _____
Occupation _____
Appointed _____ Salary _____
Permanent _____ Temporary _____
Remarks _____

Name of Person
Furnishing Information _____

Verified by _____
R-5

**RETAIL CREDIT COMPANY
LIFE REPORT**

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CONFIDENTIAL ★★ ★★

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Acct. No. _____ Date: _____
 NAME: _____
 Address: _____
 Occupation on _____
 Inc. & Employer: _____

Dist., Agcy., or Br. _____
 Pol. No. _____

INSURANCE HISTORY
 Date _____ Acct. No. _____ Amt. or Type Coverage _____ Fam. or Indiv. _____

Date of Birth: _____ A Health App'd for \$ _____ Per Hospitalization Major Medical Exp.

1. ANY REASON FOR NOT RECOMMENDING APPLICANT?
2. On what date was this inspection made?
- IDENTITY 3-A. How many years has each of your sources known applicant?
 B. How many days since you or your sources have seen applicant?
 (If not within two weeks, explain fully.)
- AGE 4. Is there any reason to doubt accuracy of birth data given?
- FINANCES 5-A. What would you estimate net worth?
 B. What is annual earned income from work or business?
 C. Has applicant any income from investments, rentals, pension, etc.?
 (If so, state source, amount.)

	NO	YES	Feature(s)
A.	<input type="checkbox"/>	<input type="checkbox"/>	
B.	<input type="checkbox"/>	<input type="checkbox"/>	
A. \$			
B. \$			
C.			

- OCCUPATION 6-A. Does the occupation or job differ in name from that given in heading of this report?
 B. Does applicant change jobs frequently?
 C. Any part-time or off-season occupation? Does applicant plan work or travel in foreign countries?
 D. Does applicant or employer sell or manufacture beer, wine or liquor?
- DRIVING RECORD 7. Is applicant a fast, reckless, or careless driver?
- AVIATION-SPORTS-AVOCATIONS 8-A. Has applicant taken flying lessons, either as member of armed forces or as civilian, owned or piloted a plane, or flown in planes not operated by scheduled airlines?
 B. Does applicant engage in hazardous sports or avocations (racing, skin or scuba diving, sky diving, mountain climbing, cave exploring, etc.)

	NO	YES	
A.			
B.			
C.			
D.			
A.			IF YES, See Questions on Back.

- HEALTH 9-A. Is there anything unhealthy about appearance, such as being very thin or having excess weight?
 B. Any deformity, amputation, blindness, deafness, or other defects?
10. Do you learn of any illness, operation, or injury, past or present?
11. Do you learn applicant was ever rejected for military service or discharged for medical reasons?
12. Do you learn of any member of family (blood relation) having had heart trouble, cancer, diabetes, tuberculosis or mental trouble?
 (If so, who and which disease.)

	NO	YES	
A.			
B.			
A.			IF YES, See Questions on Back.
B.			
A.			IF YES, See Questions on Back.

- HABITS 13-A. Is applicant a steady, frequent drinker (daily, almost daily, several times a week)?
 B. How often?
 C. How many drinks does applicant take on these occasions?
 D. What does applicant usually drink (beer, wine or whiskey)?
- IF SO, {
14. Does applicant now or has applicant in the past used beer, wine or whiskey to noticeable excess or intoxication?

	NO	YES	
A.			
B.			
C.			
D.			

- ENVIRONMENT 15. Anything adverse about living conditions or neighborhood?
- REPUTATION 16. Do any of following apply to this applicant: Heavy debts? Domestic trouble? Drug habit? Connection with illegal liquor? Irregular beneficiary?
17. Is there any criticism of character or morals?

	NO	YES	
A.			IF YES, See Questions on Back.
B.			IF YES, See Questions on Back.

18. Anything adverse on health or physical condition of other family members? (If so, cover in Remarks.)

Answer only if Family Policy NO YES

REMARKS: 19. COMMENT BELOW ON TOPICS LISTED AT LEFT; GIVE DETAILS OF "YES" OR INCOMPLETE ANSWERS.

- A. BUSINESS:**
 Employer's name, line and size of business?
 Name of applicant's job? How long so employed? Cover any indication of frequent job changes or instability of employment.
- B. ANSWER HANDY GUIDE QUESTIONS, IF APPLICABLE.**
- C. PERSONAL:** Married, single, or divorced? Any children?
 Type of associates: IF WOMAN, name of father or husband; his occupation, worth and income.

RETAIL CREDIT COMPANY

Signature of person making report _____
 OVER-SEE ADDITIONAL QUESTIONS ON BACK

LIFE REPORT

DETAILS OF APPEARANCE:

20—A. How does applicant appear unhealthy (complexion, weight, or what)? _____ B. Describe. (If overweight or underweight, give details.) _____

DETAILS OF HEALTH HISTORY ON APPLICANT:

21. Nature of illness, operation or injury? _____
22. Approximate date it occurred? _____
23—A. How long confined or "laid up"? _____
B. Completely recovered? _____
24—A. Attended by Dr. (Name) _____
Address _____
B. Confined to hospital? _____ If so, name and address:
Name _____
Address _____
25. Any effect on present health? _____ Details: _____

DETAILS OF DRIVING RECORD:

26. When, where, and under what circumstances does applicant drive in a fast or reckless manner? (Open highway, congested areas, etc.—If known to drive considerably in excess of speed limit, cover.) _____
27. Any evidence of unsupervised racing? _____ Give details: _____
28. Any arrests? _____ (Approximate dates) _____
29. Charges? _____
If convicted, approximate dates? _____
30. Any accidents? _____ If so, approximate dates and details: _____
31. License ever suspended or revoked? _____ If so, cause, date and whether applicant drove without a license? _____

ANSWER THESE IF LEARNED IN INVESTIGATION

DETAILS OF ENVIRONMENT:

32. LIVING CONDITIONS:
A. Over-crowded, dirty, unsanitary, etc.? (If so, give details.) _____
B. If apartment, dark or dirty halls, broken or littered stairs, etc.? (If so, give details.) _____
33. NEIGHBORHOOD: Deteriorating physically, poor sanitation, vice and crime, vandalism, etc.? (If so, give details.) _____

DETAILS OF DRINKING HABITS: Give these additional details to show drinking habits as definitely as possible:

34. Classify excessive drinking: Present Past
A. Getting "drunk," stupor, entirely out of control of usual faculties? _____
B. Loud, boisterous, or obviously under influence, although still in possession of most of faculties? _____
C. Mild excess, just getting "feeling good," exhilaration or stimulation? _____
35. Do (did) these occasions last for an evening, a day, two days, a week, or for how long? _____
36. How long has (had) applicant been drinking to this extent? _____
37. WHEN WAS THIS LAST OCCASION OF THIS SORT? _____
38. If applicant is an excessive drinker at present, does applicant drive a car during periods of excess? _____
39. Has applicant ever taken any "cure" for liquor habit? (If so, when? Any subsequent lapses?) _____
40. Tell how applicant drinks, if social or solitary, or if because of domestic or other trouble, how it affects applicant, whether ever arrested, and details to give clear picture of drinking habits; if habits have changed, tell how and how long since change; if reformed, what led to reformation (ill health, domestic trouble or what)? _____

	How often? (Once a week, once a month, etc.)
A. _____	A. _____
B. _____	B. _____
C. _____	C. _____

INSPECTOR: Do not write in this space.
(Use Continuation of Report, Form 5166, for additional remarks.)

RETAIL CREDIT COMPANY
SPECIAL NARRATIVE LIFE REPORT

37



CONFIDENTIAL

396

Acct. No. _____

Date: _____

NAME: _____

Address: _____

Occupation of Inc. & Employer: _____

Date of Birth _____

Dist., Agcy., or Br. _____

Pol. No. _____

REPORT FROM _____

(If not city in heading) (State whether former addr., etc.)

OFFICE _____

1. SIGNIFICANT FEATURES:			10-A. Anything unhealthy about appearance? B. Any deformity, impairment, excess weight?	NO	YES
				A.	
2. Date inspection made?			11. Any illness, operation, injury, past or present?		
		B.			
3. Years known to sources?			12. Ever rejected for military service or discharged for medical reasons?		
		A.			
4. Last seen?			13. Learn of any family member (blood relation) having had heart trouble, cancer, diabetes, T.B., or mental trouble?		
		B.			
5. Is there any reason to doubt accuracy of birthdate given?	NO	YES	14. Has applicant ever used heroin, marijuana, or other drugs as a habit?		
		A.			
6-A. Does the occupation differ in name from that in heading?			15-A. Is applicant a steady, frequent drinker (daily, almost daily, several times a week)?		
		B.			
B. Does applicant drive a car, truck, motorcycle or motorbike in connection with work?			IF SO, { B. How often? C. How many drinks taken? D. What does applicant usually drink?	A.	
		A.		B.	
7-A. Any past or present aviation interest or activity?			16. Are intoxicants used to excess or were they in past?	C.	
		B.		D.	
B. Does applicant engage in hazardous sports or avocations? (Racing, skin diving or scuba diving, sky diving, mountain climbing, cave exploring, etc.?)			17. Anything adverse about living conditions or neighborhood?		
		C.			
C. Does applicant participate regularly in any form of athletics, organized or otherwise?			18. Is there any criticism of character or morals?		
		D.			
8-A. Does applicant own or regularly drive a high performance car?			19. Irregular beneficiary? (If so, cover in remarks.)		
		E.			
B. Does applicant own or have access to a motorcycle or motorbike?			20. Anything adverse on health or physical condition of other family members? (If so, cover in Remarks.)		
		A. \$			
C. Is applicant a fast, reckless, or careless driver?			IF FAMILY POLICY		
		B. \$			
D. Has applicant had any serious accidents?			Answer only if Family Policy { <input type="checkbox"/> NO <input type="checkbox"/> YES		
		C. \$			
E. Any arrests or convictions for driving infractions?					

REMARKS: COVER TOPICS LISTED BELOW: GIVE DETAILS OF "YES" OR INCOMPLETE ANSWERS.

SOURCES: Show type of source; that is, banker, business associate, neighbor, etc. IF APPLICANT NOT INTERVIEWED, EXPLAIN REASON WHY.

BUSINESS: Business history, present employer, type and size of business, how long employed, previous record.

DUTIES: Comment only when: Any part of question "6" answered "YES"; Handy Guide questions are applicable; any part-time or off-season occupation learned.

AVIATION-SPORTS-AVOCATIONS: Comment only when any part of question "7" answered "YES."

DRIVING: Amplify "YES" answer to any part of question "8"; cover Handy Guide questions when applicable. Include any file information at your disposal—previous Auto report, MVR check (negative or otherwise), etc.

FINANCES: Show what makes up worth. Break down earned income including bonuses and commissions. Give amount and source of unearned income. Comment on financial reputation.

HEALTH-FAMILY HISTORY: Cover health, past and present. If any treatment or hospitalization developed due to illness, operation, or injury, give full details (dates, nature, how long confined, name and address of attending physician, name and address of hospital, if confined, any effect on present health.) IF INTERVIEWED, obtain name and address of applicant's PERSONAL and/or FAMILY PHYSICIAN, dates of examinations and reasons. Comment on build in relation to height and weight. FAMILY HISTORY—Cover any diseases learned of in the family (blood relation). Tell who and what disease.

REPUTATION: Marital status? Children? Include comment on associates; home, social, and club life.

INSURANCE HISTORY	Date	Acct. No.	Amt. or Type Coverage	Fam. or Individ.
-------------------	------	-----------	-----------------------	------------------

DETAILS OF DRINKING HABITS: If intoxicants used to excess now or in the past, answer questions below.

21. Classify excessive drinking: Present Past

- A. Getting "drunk," stupefied, entirely out of control of usual faculties?
- B. Loud, boisterous, or obviously under influence, although still in possession of most of faculties?
- C. Mild excess, just getting "feeling good"; exhilaration or stimulation?
- D. Do (did) these occasions last for an evening, a day, two days, a week, or for how long?
- E. How long has (had) applicant been drinking to this extent?
- F. WHEN WAS THE LAST OCCASION OF THIS SORT?
- G. If applicant is an excessive drinker at present, does applicant drive a car during periods of excess?
- H. Has applicant ever taken any "cure" for liquor habit? (If so, when? Any subsequent lapse?)

How often? (Once a week, once a month, etc.)

A.	A.
B.	B.
C.	C.

Tell how applicant drinks, if social or solitary, or if because of domestic or other trouble, how it affects applicant, whether ever arrested, and details domestic trouble or what?

DETAILS OF ENVIRONMENT:

- 2. LIVING CONDITIONS:
 - A. Over-crowded, dirty, unsanitary, etc.? (If so, give details.)
 - B. If apartment, dark or dirty halls, broken or littered stairs, etc.? (If so, give details.)
 - C. NEIGHBORHOOD: Deteriorating physically; poor sanitation, vice and crime, vandalism, etc.? (If so, give details.)

FIELD REPRESENTATIVE: Do not write in this space. (Use Continuation of Report, Form 5166, for additional remarks.)

**RETAIL CREDIT COMPANY
SPECIAL LIFE REPORT**

39



CONFIDENTIAL

398

Acct. _____	Dist., Agcy., or Br. _____	REPORT FROM _____ OFFICE _____
Date: _____	Pol. No. _____	(If not city in heading) (State whether former addr., etc.)
NAME: _____		Amt. applied for \$ _____
Address: _____		Amt. now carried (All Cos.) \$ _____
Occupation on _____		Total Insurance \$ _____
no. & Employer: _____		Beneficiary _____
Date of Birth: _____		(If business, make Business Beneficiary Report also.)

SIGNIFICANT FEATURES:

<p>1. On what date was this inspection made?</p> <p>2-A. How many days since you or your sources have seen applicant? (If not within two weeks, explain fully.)</p> <p>B. Is there any reason to doubt accuracy of birth date given?</p>	<p>A.</p> <p>B.</p>	<p>IDENTITY</p>
<p>3-A. Does the occupation or job differ in name from that given in heading of this report?</p> <p>B. Has applicant any business connections other than given above?</p> <p>C. Does applicant plan to work, travel, or reside in foreign countries?</p> <p>D. Does applicant or employer sell or manufacture beer, wine, or liquor?</p> <p>E. Any hazardous duties connected with job or occupation?</p>	<p>A.</p> <p>B.</p> <p>C.</p> <p>D.</p> <p>E.</p>	<p>BUSINESS—DUTIES</p>
<p>4-A. Has applicant taken flying lessons, either as member of armed forces or as civilian, owned or piloted a plane, or flown in planes not operated by scheduled airlines?</p> <p>B. Does applicant plan to buy a plane or become a student pilot?</p> <p>C. Does applicant engage in hazardous sports or avocations (racing, dune buggy, skin or scuba diving, sky diving, mountain climbing, cave exploring, etc.)?</p> <p>D. Does applicant participate regularly in any form of athletics, organized or otherwise? (What?)</p>	<p>A.</p> <p>B.</p> <p>C.</p> <p>D.</p>	<p>AVIATION—SPORTS—AVOCATIONS</p>
<p>5-A. Does applicant own or regularly drive a high performance car?</p> <p>B. Does applicant own or have access to a motorcycle or motorbike?</p> <p>C. Is applicant a fast, reckless, or careless driver?</p> <p>D. Has applicant had any serious accidents?</p> <p>E. Any arrests or convictions for driving infractions?</p> <p>F. Has license ever been revoked or suspended?</p>	<p>A.</p> <p>B.</p> <p>C.</p> <p>D.</p> <p>E.</p> <p>F.</p>	<p>DRIVING RECORD</p> <p>IF YES, See Questions on Back.</p>
<p>6-A. What would you estimate net worth?</p> <p>B. How was this worth acquired (Inherited, accumulated, or by speculation)?</p> <p>C. What is annual salary or earned income (Include bonus & commissions)?</p> <p>D. What additional income, if any, from other sources? (Consider investments, inheritance, rentals, etc.)</p> <p>E. Any indication applicant is not increasing worth and income?</p> <p>F. Do you learn that applicant is being pressed financially?</p>	<p>A. \$</p> <p>B.</p> <p>C. \$</p> <p>D. \$</p> <p>E.</p> <p>F.</p>	<p>FINANCES</p>
<p>7-A. Is there anything unhealthy about appearance, such as very thin, excess weight?</p> <p>B. Any deformity, amputation, blindness, deafness or other defects?</p> <p>C. Do you learn of any illness, operation or injury, past or present?</p> <p>D. Does applicant show signs of nervousness or effects of business strain?</p> <p>E. Do you learn applicant was ever rejected for military service or discharged for medical reasons?</p> <p>F. Do you learn of any member of family (blood relation) having had heart trouble, cancer, diabetes, tuberculosis or mental trouble? (If so, who and which disease?)</p> <p>G. Has applicant occupied the same home with a tuberculous person?</p> <p>H. Ever changed residence because of health?</p>	<p>A.</p> <p>B.</p> <p>C.</p> <p>D.</p> <p>E.</p> <p>F.</p> <p>G.</p> <p>H.</p>	<p>APPEARANCE—HEALTH</p> <p>IF YES, See Questions on Back.</p>
<p>8-A. Has applicant ever used heroin, marijuana or other drugs as a habit?</p> <p>B. Is applicant a steady, frequent drinker (daily, almost daily, several times a week)?</p> <p>IF SO, C. How often?</p> <p>D. How many drinks does applicant take on these occasions?</p> <p>E. What does applicant usually drink?</p>	<p>A.</p> <p>B.</p> <p>C.</p> <p>D.</p> <p>E.</p>	<p>HABITS (Drug—Drink)</p> <p>IF YES, See Questions on Back.</p>
<p>9. Does applicant now or has applicant in the past used intoxicants to excess?</p> <p>10-A. Has applicant any personal difficulties, domestic troubles, illegal liquor or other connections that might affect desirability as a risk?</p> <p>B. Is there any criticism of character or morals?</p>	<p>A.</p> <p>B.</p>	<p>REPUTATION</p>

11. **IF FAMILY POLICY:** Anything adverse on health or physical condition of other family members? (If so, cover in Remarks.)

Answer only if Family Policy NO YES

SOURCES:	Type	How Known	Years Known

INTERVIEW: (If no interview, explain) _____

PREVIOUS REPORTS: _____ covering _____ years through _____ sources.

RECORDS: (Type) _____

12. DETAILS OF DRIVING RECORD:

40

Details: When, where, and under what circumstances does applicant drive in a fast or reckless manner? (Include any file information at your disposal—previous Auto Report, MVR check—negative or otherwise, etc.)

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ANSWER THESE IF LEARNED IN INVESTIGATION

- A. Any Accidents? _____ Dates? _____
- B. Any Arrests? _____ Dates? _____
Charges? _____
Convicted? _____ Dates? _____
- C. Has license of applicant ever been suspended or revoked? _____ Dates? _____
- D. Is there evidence of any unsupervised racing? _____ (Give details)

13. DETAILS OF APPEARANCE:

B. Describe, if overweight or underweight, give details.

A. How does applicant appear unhealthy (Complexion, weight, or what)?

14. DETAILS OF HEALTH HISTORY:

Details:

- A. Nature of Illness, Operation or Injury? _____
- B. Approximate Date it occurred? _____
- C. How long "Laid up" or confined? _____
Completely Recovered? _____
- D. Attended by Dr. (Name)? _____
Address _____
- E. Confined to Hospital? _____
Name _____
Address _____
- F. Any effect on present health? _____

15. DETAILS OF DRINKING HABITS:

A. Would you classify excessive drink habits past or present? (State Which)

B. Classify drinking on these occasions and state how often:

- 1. Getting stupefied, entirely out of control of usual faculties?
- 2. Loud, boisterous, or obviously under influence, although still in possession of most of faculties?
- 3. Mild excess, just getting "feeling good"; exhilaration or stimulation?

C. Do (did) these occasions last for an evening, a day, two days, or a week or for how long?

D. How long has (had) applicant been drinking to this extent?

E. When was the last occasion of this sort?

F. If excessive drinker at present, does applicant drive a car during periods of intoxication?

G. Has applicant ever taken any "cure" for liquor habit? (If so, when?)

A. _____
E. _____
How often? (Once a week, once a month, etc.)

- 1. _____ 1. _____
- 2. _____ 2. _____
- 3. _____ 3. _____

- C. _____
- D. _____
- E. _____
- F. _____
- G. _____

ANSWER THESE IF ANY PAST OR PRESENT EXCESSIVE DRINKING

Details: Tell how applicant drinks, if social or solitary, or if because of domestic or other trouble, how it affects applicant, whether ever arrested, and details to give clear picture of drinking habits; if habits have changed, tell how and how long since change; if reformed, what led to reformation (ill health, domestic trouble or what)? If liquor cure taken, give details. Any subsequent lapses? COVER ANY DRUG HABIT FULLY.

FIELD REPRESENTATIVE: Use Continuation of Report, Form 5168 to give details of "Yes" and incomplete answers on front of this form AND to write applicable Remarks called for below.

INSURANCE HISTORY: Quote insurance history in column form giving date, account number, amount applied or type of coverage and whether family or individual coverage.

INTERVIEW WITH APPLICANT: Describe briefly applicant's appearance as observed during interview (coloring, build in relation to height and weight, etc.) Give name and address of PERSONAL PHYSICIAN. Tell when this physician was last seen by applicant and specific reason(s) why he was seen. COVER FULLY ANYTHING OF A SERIOUS NATURE. If applicant also has a FAMILY PHYSICIAN, give name and address, when and why last seen by applicant. Cover whether applicant was cooperative and comment on any information obtained in interview that conflicts with that given by sources.

MILITARY: If ever classified 4F, medically discharged, or now in active reserve, cover fully. Otherwise comment only on draft classification if between ages 18 and 25 inclusive.

BUSINESS HISTORY: Cover in chronological order up to present time for 1/2 of applicant's life. (Be concise and avoid wordiness.)

PRESENT BUSINESS: Cover this fully. Describe type of business, size and range of operations. If any other or part time business interests, cover fully.

DUTIES: Give brief description of applicant's duties. Cover fully any YES answers to any part of question "3." Cover Handy Guide questions if applicable.

AVIATION—SPORTS—AVOCATIONS: Comment on aviation only if questions 4—A, or 4—B, answered YES. Cover participation in sports (hazardous or otherwise), and avocations.

FINANCES: Show what makes up worth. Also, cover any separate worth of immediate family. Break down applicant's income—salary, bonus, commission, dividends, interest, rent, etc. Cover any separate income of immediate family. If applicant is professional man or self-employed, give income after expenses; on self-employed, be specific on amount of income which is reinvested in the business. Attach Financial Statement, if obtained.

HEALTH—FAMILY HISTORY: Cover present health and give details of any illnesses, injuries or operations not shown above. FAMILY HISTORY—Cover any diseases, learned of in the family (blood relation). Tell who and what disease.

REGISTRATION: Cover home and personal standing; complete family picture. If interested in any civic, social, church organizations, or has any non-hazardous recreational interests, comment on these.

BENEFICIARY—PURPOSE OF INSURANCE: If entirely regular, merely so state. If irregular in any way, cover thoroughly purpose of insurance. If firm or partner named beneficiary, state specifically that Business Beneficiary Report is attached.

DAILY PROTECTIVE INFORMATION AND INQUIRY CONTROL RECORD

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Date: _____

A. VOLUME CONTROL:

Production Today: \$ _____ Accumulative Production: \$ _____

Daily Quota: \$ _____ Accumulative Quota: \$ _____

Amount Above or Below Quota so far this Month: \$ _____

INSPECTOR

B. DETAILS OF PROTECTIVE INFORMATION, ALL TYPES REPORTS:

Acc. No.	Type Rept.	Name of Case	Protective Feature	M. P.	Dec.
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					
16.					
17.					
18.					
19.					
20.					

C. PROTECTIVE CONTROL:

Type Report	# Cases made today	# Cases made this month	Total # Protective (Include Decline)		# Decline		% Protective	% Decline
			Today	Tot. for Month	Today	Tot. for Month		
and Health								
In-								
trial Life								
Life								
W. Life								
to								
all cases								

INSPECTOR: Refer frequently to "USABLE INFORMATION GUIDE." Is your information of real underwriting value?
 Please fill out this form daily and give to your supervisor for checking and initialing.

SUPERVISOR:

- Handle on a daily basis. You carry responsibility for approving all Decline cases and indicating this action by initialing the permanent file copy of the report. Do not initial this form until you have approved all Decline cases listed above.
- Figure percentages of Protective and Decline weekly and at end of each month. (Divide total number of cases into total number of protective or decline cases.)

RETAIL CREDIT COMPANY
AUTOMOBILE INSURANCE REPORT



CONFIDENTIAL

ATTENTION OF _____ OFFICE _____

Acct. No. _____

Agency-Dr. _____

Pol. # _____

SIGNIFICANT
FEATURES:

0	Not Requested by Customer
1	Attached or Included
2	Will Follow
3	Need Further Identification to order
R	See Remarks

Explanation of MVR Handling on Each Driver:

Automobile #1 _____ #2 _____ #3 _____

SOURCES: These _____ Previous _____ Police or _____ Direct Interview _____
Known _____ Yrs. Reports _____ Yrs. Traffic Rec. _____ (If so, who?) _____
Was "Drivers" & "Uses" Info. _____ How long _____ If less than one year, _____
Obtained in Direct Interview? _____ at address? _____ give former address? _____

DRIVERS Name All Drivers Including Insured	Relationship to Insured	Age or Date of Birth	Sex	Marital Status	Occupation (If Military or Student, see over)	% Drives Car			No. Years Driving	MVR
						#1	#2	#3		
Insured	Insured									

IF ANY "YES" ANSWERS (Except #2)--AMPLIFY BELOW OR SECTION ON REVERSE SIDE
(READ REMARKS WITH QUESTION NUMBER)

USES:
If Car #2 or #3 developed,
give yr. and make.

INSURED: (Continued)

Class as shown on inquiry	CAR #1		CAR #2		CAR #3		Income \$	
	NO	YES	NO	YES	NO	YES	NO	YES
1. Any business use? (If so, give details.)								
2. Is vehicle used to drive to and from work? If so, give--(a) One-way mileage (b) Times/week								
3. Estimated annual mileage?								
4. Is vehicle used in car pool, share ride, etc.?								
5. Any driver a student--IF YES, SEE OVER								
6. Any driver under age 25? } IF YES, SEE OVER								
7. Any driver age 65 or over? }								

16. Estimate Net Worth & Annual Income. Worth \$ _____
Income \$ _____

17. Reputation of business questionable? NO YES

18. Any evidence of job instability? NO YES

19. Any part-time job? NO YES

20. Finances--credit unsatisfactory?
21. Personal-family reputation or associate questionable? NO YES

22. Any criminal record learned?
23. Is insured argumentative, antagonistic type? NO YES

24. Driving reputation questionable?
25. Drink habits excessive? (Boisterous, intoxication, regular user.) NO YES

26. Any physical or mental impairment? NO YES

VEHICLES--GARAGING:

8. Is vehicle in poor or damaged condition? (Include Glass, Tires, Paint, etc.) NO YES

9. Any vehicle altered or "souped-up"? NO YES

10. Is vehicle kept on street at night? NO YES

11. Any additional cars in household? (including go-carts, scooters, etc.) NO YES

INSURED:

12. Any English language difficulty? NO YES

13. Any children, age 14 or over, who do not drive? NO YES

14. If married, age and sex of children at home, away in school or in military service?
Home: _____ Age _____ Sex _____
School: _____
Military: _____

15. Employment--(Answer as learned through Interview or normal sources.)
A. Name of employer if different from heading: _____
B. Kind of Business: _____
C. Position and Exact Duties: _____
D. How long at present job? (If less than one year give former occupation) _____

OTHER DRIVERS:

(Including Youthful & Elderly Driver)

27. Personal reputation or associates questionable? NO YES

28. Driving reputation questionable?
29. Drink habits excessive? (Boisterous, intoxication, regular user.) NO YES

30. Any physical or mental impairments? NO YES

LOSSES--VIOLATIONS:

31. Any traffic convictions, revocations or suspensions known in past five years? NO YES

32. Any accidents, fire or theft losses known in past five years? NO YES

ENVIRONMENT:

33. Any criticism of neighborhood? NO YES

34. Crime rate high? NO YES

35. Premises poorly kept? NO YES

36. Insured live in other than home or apartment? NO YES

37. Any other factor that would affect insurability? NO YES

POSSIBLE PREVIOUS CARRIER:	Date of File Report	Name of Company	Company Address	Vehicle Covered	Policy Number

Source for pages 42-50: U.S. 91st Congress, 1st Session, Senate Committee on Banking and Currency, Subcommittee on Financial Institutions, Fair Credit Reporting, Hearings. Washington, Government Printing Office, 1969.

AMPLIFY ANSWERS NEEDING CLARIFICATION

YOUTHFUL DRIVERS—UNDER 25

Name: _____

Completed Accredited Driver Training? No Yes

A. Drives ONLY as Directed by Parents (Errands—to drug store, for groceries, to gas station, dry cleaners, etc.)

B. Drives for Business, Pleasure, Social Use (To part or full time job, to school, for dating, just "cruising around," etc.)

Answer (1) and (2) Below ONLY if "B" Block Checked:

(1) Describe use in detail (Explain HOW used and give DISTANCES TRAVELED if feasible): _____

(2) Give estimate of total number of times per week used for Business, Pleasure and Social Use (Do not include errand use as in "A" above): _____

STUDENT DRIVER

Name: _____

Is he (she) attending:

High School College

Local Out of Town

If out of town, give city, state and approximate distance: _____

Is car kept at school? No Yes Is car driven to school? No Yes

If yes, how often? _____

MILITARY INSURED

Name: _____

Is insured career military person? No Yes

His rank is officer; other (describe): _____

Name of camp / base? _____

Location? _____

Is insured AUTO driven frequently to distant points? No Yes

If yes, how often? _____

Distance: _____

Does insured lend or rent vehicle to others? No Yes

Name of state license on vehicle, if feasible: _____

ELDERLY DRIVER (AGE 65 OR OVER)

Name: _____

	No	Yes
Age verified?	<input type="checkbox"/>	<input type="checkbox"/>
Is driver mentally alert?	<input type="checkbox"/>	<input type="checkbox"/>
In good physical condition?	<input type="checkbox"/>	<input type="checkbox"/>

	No	Yes
Is sight impaired?	<input type="checkbox"/>	<input type="checkbox"/>
Hearing impaired?	<input type="checkbox"/>	<input type="checkbox"/>
Other faculties impaired in any way?	<input type="checkbox"/>	<input type="checkbox"/>

EXCESSIVE DRINKER:

Name: _____

Classify drinking—

"Drunk," stupefied, entirely out of control of faculties.

Loud, boisterous, obviously under influence, but still in control of faculties.

None of above, but regular drinker (almost daily) and often has alcohol on breath.

How long do excesses last? _____

On what occasions? _____

Does he drive afterwards? No Yes

Describe circumstances: _____

IMPAIRED DRIVER (Physical, mental, health):

Name of driver: _____

Length of time impaired? _____

Nature of Impairment

Epilepsy Heart Mental

Leg Arm Eye Ear

Other _____

If leg, arm, eye— Right Left

If amputated, where? _____
(Above knee, below elbow, etc.)

Extent of Impairment

Check block if artificial limb, glasses, hearing aid, leg brace, etc., used.

Check block if vehicle altered by special brake, extended clutch, etc.

(Cover in Remarks how mechanical and artificial aids assist in correcting impairment.)

Cause of Impairment

Sickness Accident Since Birth

Military Service Other _____

Impairment Status

Improving Getting Worse Remaining same

REMARKS

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AMERICAN SERVICE BUREAU

SPECIAL SERVICE LIFE REPORT
CONFIDENTIAL

DISTRICT, AGENCY, POL. NO. (quote back)

Co. No. _____
Date: _____
NAME: _____
Birth Date: _____
Res. Address: _____
Occ. & Emp: _____
Bus. Address: _____
Applied for \$ _____
Beneficiary: _____

Now Carried All Cos. \$

REPORT FROM _____ OFFICE
Investigated at _____
(If not city in heading) (State whether former address, etc.)

TRANSFER NOTE: On _____ (Date)
We Transferred To _____ Office
For Handling At _____

PRESENT FORMER RESIDENCE EMPLOYER
(For any additional transfers, see note at end of report)

1. A-How many years have you or your informants known applicant? B-How many days since you or your informants have seen him? C-Have you any reason to believe age stated above is incorrect? D-What is his racial descent?	A B C D	IDENTITY
2. A-What is name of employer? B-What is the nature of the business? C-What is applicant's occupation? D-Has he any other business connections? E-Does he or employer sell or manufacture beer, wine or liquor? F-Does he plan to work, travel or reside in foreign countries?	A B C D E F	OCCUPATION
3. A-What would you estimate his net worth? B-How was worth acquired? (Inherited, from business, investments, etc.) C-What is annual earned income from work or business? (Include bonus and commissions.) D-What income has he from other sources? (Stocks, rentals, inheritance, etc.) E-Any indication he is not increasing his worth and income? F-Do you learn he is pressed financially?	A \$ B C \$ D \$ E F	FINANCES
4. A-Is he now, or was he in the past, considered a fast, careless, or reckless driver? B-Do you learn of any traffic arrests, charges, or convictions?	A B	DRIVING
5. A-Has applicant taken flying lessons, owned or piloted a plane, or flown as a passenger in other than a commercial air line, either as a civilian or member of the Armed Forces? B-Does he plan to buy a plane or become a student pilot? C-Does he engage in hazardous sports? (Racing, sky diving, skin diving, etc.)	A B C	AVIATION
6. A-Is there anything unhealthy about his appearance? B-Has he any deformity, impairment, excess weight, or other defect? C-Do you learn of any illness, medical treatment, hospital confinement, operation or injury, either past or present? D-Is he unusually nervous, or any indication of business strain? E-Does he smoke cigarettes? (If Yes, cover in Health paragraph) F-Do you learn of any member of applicant's family having Cancer, Heart trouble, Tuberculosis, Insanity, Epilepsy, Diabetes, or Mental trouble? G-Do you learn of any rejection from Military Service, or if discharged for medical reasons? H-Has he ever changed residence because of health reasons?	A B C D E F G H	HEALTH
7. A-Does applicant drink daily or almost daily? B-Does he now, or has he in the past, drunk intoxicants to excess or noticeable intoxication?	A B	HABITS If YES, complete Habits Suppl.
8. A-Is there any criticism of environment or living conditions?	A	ENVIRONMENT If YES, complete Env. Suppl.
9. A-Do any of the following apply: Domestic trouble, illegal activities, drug addiction, gambling, police record, or anything else affecting his desirability as an insurance risk? B-Any criticism of character, morals, or associates? C-Do you know of any reason why applicant is not a desirable risk for life insurance?	A B C	REPUTATION
10. INFORMANTS: Identify each informant by type, how he has known applicant and how long. If you interviewed applicant or checked records, so state.		

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DETAILS OF HEALTH HISTORY ON Name Age

HEALTH: If you learn of any illness, medical attention, hospitalization, or injury to any member of the family, either past or present, answer these questions.

HEALTH QUESTIONNAIRE

9. A—What is (was) nature of illness, operation or injury? B—On approximate what date did this occur?	A B
10. A—How long was he confined or disabled? B—Has he completely recovered? C—If so, when? (Give date of recovery.)	A B C
11. A—Names of physicians who attended him? (Give names and addresses, if possible.) B—Did he go to a hospital? (If so, give name and address, if possible.)	A B

REMARKS: Comment on present and past health and give detailed information concerning any unfavorable health history.

HABITS: If applicant drinks to excess now or in the past, or, is a steady free drinker answer these questions.

DRINK HABITS QUESTIONNAIRE

12. A—Does applicant at the present time become intoxicated, or show signs of excessive drinking? B—If drink habits have improved, how long since applicant drank to excess?	A B
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------

IF APPLICANT NOW DRINKS TO EXCESS, OR HAS IN THE PAST, ANSWER THESE QUESTIONS:

	PRESENT	PAST
13. A—How often does (did) applicant become intoxicated, or show signs of excessive drinking? (State how often; weekly, monthly, six times annually, etc.)	A	A
B—How long do (did) these occasions last? (Overnight, 2 or 3 days, a week, etc.)	B	B
C—Degree of intoxication: (a) Drunk and out of control with loss of usual faculties? (b) Loud, boisterous, quarrelsome, belligerent, but still in possession of most faculties? (c) To mild excess, happy, clear speech, well mannered and in possession of faculties?	C (a) (b) (c)	C (a) (b) (c)
D—How long has applicant (did applicant) drank to this extent?	D	D
E—Does (did) applicant drink in bars, roadhouses, night clubs, private clubs, at parties, homes of friends, etc.?	E	E
F—Does applicant drive a car when under influence of liquor?	F	F
G—How long since applicant was last intoxicated?	G	G
H—Has applicant ever received medical treatment, or taken a "cure" for liquor habit? If so, when? After "cure" was there a relapse?	H	H

REMARKS: If habits criticized, describe pattern of his drinking, his behavior, effect on him. WHY DOES APPLICANT DRINK? Influence of associates, because of family troubles, health or mental disturbances, business or financial reverses, etc. Has he ever been arrested for drinking or driving while under influence? If reformed was it because of ill health, family or employer influence, or what?

INSURANCE HISTORY: Date Name of Company Applied For

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AMERICAN SERVICE BUREAU

FAMILY PLAN REPORT
CONFIDENTIAL

District, Agency or Policy No.

Cd. No.

REPORT FROM _____ OFFICE

Date:

NAME:

Birth Date:

Res. Address:

Occ. & Emp:

Bus. Address:

Life App'd.5

Beneficiary:

Insur. App'd.5

Per

TRANSFER NOTE: On _____ (Date)
We Transferred To _____ Office
For Handling At _____

PRESENT FORMER RESIDENCE EMPLOYER
(For any additional transfers, see note at end of report)

1. A—How many years have you or your informants known applicant? B—How many days since you or your informants have seen applicant? C—Have you any reason to believe age stated above is incorrect? D—What is race or national extraction? (Anglo-Saxon, Italian, Negro, Mexican, etc.)	A B C D	IDENTITY
2. A—Estimate applicant's total net worth. B—What is annual earned income from work or business? C—Has applicant any unearned income from stock, rentals, pensions, etc.? (If so, estimate amount and source.)	A B C	FINANCES OCCUPATION
3. A—What is name of employer? B—What is nature of the business? (What they manufacture, distribute, etc.) C—What are applicant's duties of occupation? (Carpenter, laborer, Clerical, etc.) D—Does applicant ever work temporarily or part-time at other occupations? (Example: miner, logger, bartender, etc.) E—Does employer sell or manufacture whiskey, wine or beer? (If so, explain in remarks.) F—Is applicant a reckless auto driver, or engage in motorcycle, stock car racing, skin diving, or hazardous sports?	A B C D E F	OCCUPATION AVIATION
4. A—Has applicant taken flying lessons, owned or piloted a plane or flown as a passenger in other than Commercial Airlines? (If so, explain in remarks.) B—Does he plan to take flying lessons or to fly as a passenger in a non-commercial plane? (If so, explain in remarks.)	A B	AVIATION
5. A—Does appearance indicate POOR HEALTH? B—Is applicant thin, emaciated or unusually large or fat? (If so, describe in remarks.) C—Is applicant lame or deformed; loss of arm or leg, blind, deaf, unusually nervous, or abnormal mentally? D—Do you learn of any illness, medical treatment, hospital confinement, operation or injury either past or present? E—Do you learn of any impairment causing rejection from MILITARY SERVICE, or if discharged for medical reasons? F—Do you learn of the applicant or any member of his family having Tuberculosis, Insanity, Epilepsy, or other hereditary or contagious diseases?	A B C D E F	HEALTH IF "YES," ANSWER QUESTIONS ON BACK. Any impairments of: Eyesight? <input type="checkbox"/> Hearing? <input type="checkbox"/> Loss of Limb? <input type="checkbox"/>

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6. A—Does applicant drink intoxicants daily or almost daily? B—Does applicant now, or, has he in the past drunk intoxicants to excess or to noticeable intoxication?	A B	HABITS IF "YES," ANSWER QUESTIONS ON BACK.
7. A—Do any of the following apply to applicant: Domestic trouble, illegal sale of liquor or drugs, drug addiction, immoral or illegal activities, gambling, bankruptcy, heavily in debt, police record, etc.? (If so, explain in remarks.) B—Is there any criticism of applicant's character, morals or associates? C—Do you know of any reason why applicant is not a desirable risk for life insurance?	A B C	REPUTATION
8. List OTHER FAMILY MEMBERS as appear on inquiry ticket. Also list any other children not appearing on inquiry ticket.		OTHER FAMILY MEMBERS

Name	Relationship	Sex	Age	Living At Home?	Gainfully Employed?	Unhealthy Appearance, Physical Deformities or Abnormal Mentally?	Any Illness, Injury or Operation Either Past or Present. (If so, Complete Questions on Back.)

REMARKS: WRITE PARAGRAPH OPPOSITE EACH CAPTION. COVER UNFAVORABLE HEALTH AND HABITS INFORMATION ON REVERSE SIDE.

A—BUSINESS DUTIES
(Head of Family) Name employer, Nature and size of business, What is manufactured or distributed, How long employed, Exact daily duties in his work, Any recent change, explain previous occupation, Temporary, part-time or off-season employment. (Example: mining, logging, bartender, etc.)

B—PERSONAL
(Head of Family) State whether married, widowed or divorced, Habits, moral conduct and character.

C—FAMILY
Comment on health of all family members. (Do not name them.) Illness, injury or operation, either past or present, cover in Health paragraph on back. Living conditions and home environment. If any between ages 18 to 26 state MILITARY STATUS.

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HEALTH: If you learn of any illness, operation, medical attention, hospitalization, or injury, past or present, answer these questions.

HEALTH QUESTIONNAIRE

11. A—What is (was) nature of illness, operation or injury? B—On approximately what date did this occur?	A B
12. A—How long was he confined or disabled? B—Has he completely recovered? C—If so, when? (Give date of recovery.)	A B C
13. A—Names of physicians who attended him? (Give names and addresses, if possible.) B—Did he go to a hospital? (If so, give names and addresses, if possible.)	A B

REMARKS: Comment on present and past health and give detailed information concerning any unfavorable health history.

INSURANCE HISTORY: Date Name of Company Applied for

INSPECTOR: USE FORM 2 TO COVER REMARKS BELOW.

- MILITARY:** If age 18-25, comment on draft classification. On 26-36, comment on reserve status. If ever classified 4F or medically discharged, cover fully.
- BUSINESS HISTORY:** Give brief business history covering at least 1/4 of subject's life, in chronological order up to present time.
- PRESENT EMPLOYMENT:** Name of present employer, type and size of business. Cover what they manufacture, distribute or service rendered. If any part-time business connections, cover fully.
- DUTIES:** Describe duties and where performed. If various duties, what portion of time spent at each. Comment if any part-time occupation or foreign travel.
- FINANCES:** Cover what makes up net worth. Break down earned income estimates by salary, bonus, commissions, etc. If any unearned income, comment on source. If self-employed, give income before and after expenses. Comment on financial reputation and prospects.
- DRIVING-AVIATION-RECREATION:** Amplify any YES answer to questions 4 or 5. Comment on any hobbies, sports, or recreational activities.
- HEALTH-FAMILY HISTORY:** If interviewed, describe physical appearance. Comment on present health and health history. (Provide specific details in HEALTH section.) Also, cover family health history, if possible. If applicant smokes cigarettes, how many packs per day? If he formerly smoked cigarettes, how long ago did he quit?
- HABITS:** Describe drinking habits. If questions 7A or 7B answered YES, attach Habits Supplement.
- REPUTATION:** Describe family picture, with whom he lives and number of children. Comment on family reputation. Describe neighborhood and environment. (If any criticism, attach Environment Supplement.) Comment on social, fraternal, or civic activities.
- BENEFICIARY:** If entirely regular, merely state so. If irregular or unusual, cover fully the relationship and purpose of the insurance. If firm, corporation or business partner named, attach a separate Business Beneficiary report.

HABITS SUPPLEMENT



WHOM? (See below for information apply to?)

Degree of excessive drinking:
(a) Drink, out of control
(b) Moderate excess
(c) Slightly exhilarated

NAME	HOW OFTEN? (Daily, Weekly, Etc.)	HOW LONG? (Months, Years, Etc.)	LAST TIME?

DEFINITIONS: Rate paragraph question each option, providing a complete word picture of habit situation.

WHERE?

(Gone, evicted, lounge, club, parties at home, etc.)
WITH WHOM?
DRIVE after drinking?

WHAT effect on reaction? (Level or self-control, check courage, quiet or mood, wildly ex-hilarated?)
If level or self-control, any lights as a result?

WHAT effect on his personal or business reputation?
(Carey standing in neighborhood, any job interviews? Late to work, frequent absences, neglect of duties, etc.?)

WHY do you think? (Business interruption, personal affairs, associates, mental troubles, financial or health problems, mental disturbances, etc.)

HABIT formed or habits improved?

WHEN?

Approximate because of ill health?
Period or episode influenced habit
(442 Medical case, etc.?)

Are HABITS or habits substantially better?

WHEN? Give details.

COMPLICATION: Indicate how complicated.
(Victims, business associates, etc., etc., etc.)

HABITS SUPPLEMENT
Form 1088 (Rev. 5-67)

AMERICAN SPIRIT BUREAU

ENVIRONMENT SUPPLEMENT



ANSWER FOR: Fill in an "X" to the appropriate answers. Multiply timely answers in boxed questions.

NAME _____			
1. WHAT TYPE AREA?	A. Average residential B. Congested C. Semi-Commercial D. Rural	A B C D	
2. WHAT IS NEIGHBORHOOD CONDITIONS?	A. Stable B. Deteriorating C. Slum *D. High vice or crime	A B C *D	
3. WHAT CLASS RESIDENTS?	A. Upper middle B. Middle C. Low Income D. Poor or poverty	A B C D	
4. WHAT TYPE OF DWELLING?	A. Single Family B. Multiple C. Apartment D. Tenement	A B C D	
5. HOW IS DWELLING MAINTAINED?	A. Above average for area B. Average for area *C. Below average for area *D. No apparent maintenance	A B *C *D	
6. HOW IS YARD AND PREMISES?	A. Neat and well-landscaped *B. Tidy or no care *C. Tidy but badly planned A. Neat and clean *B. Cluttered *C. Dirty or unsightly	A *B *C A *B *C	
7. HOW IS HOUSEKEEPING?	A. Satisfactory *B. Cramped *C. Completely inadequate	A *B *C	
8. HOW ARE SLEEPING ACCOMMODATIONS?	A. Satisfactory *B. Cramped *C. Completely inadequate	A *B *C	
9. HOW ARE BATHROOM FACILITIES?	A. Satisfactory B. Inadequate for number of residents *C. No inside facilities	A B *C	
10. WHAT ABNORMAL FIRE HAZARDS EXIST?	A. None *B. Deteriorating condition *C. Poor wiring *D. Heating system *E. Needle hazards	A *B *C *D *E	

Approximate number of units
 Privately owned Public housing

ENVIRONMENT SUPPLEMENT
Form 1030 (Rev. 5-69)

AMERICAN SERVICE BUREAU

Form 1077-10

CONFIDENTIAL
O'HANLON REPORTS

AUTOMOBILE REPORT



Acct. No.

Attention of

Your Classification

Policy No.

Agency

SPECIMEN COPY

M	0-Not Requested By Customer
V	1-Attached or Included
V	2-Will Follow
R	3-Need Further Identification to order-- See Remarks

Car No. 1 Car No. 2

Time Sources: Known Previous Direct Interview? Was "Drivers" & "Uses" Info. (b) Obtained in Direct Interview?

Pol./Traffic Red Checked? How Long at Present Address? Yrs. Reports Yes. If so, (a) Whom? If Known Less Than 1 Yr. Yrs. Give Former Address?

DRIVERS	Relationship to Insured	Age or Date of Birth	Sex	Marital Status	Occupation	% Drives		No. Yrs. Driving	MVR
						Car #1	Car #2		
Insured	Insured								

BUSINESS DUTIES: Describe duties to reflect possible business use of car. Example: "Salesman—Inside Only" or "Salesman—Calls on Customers." If at present job less than 1 year—previous occupation. IF RETIRED—REASON, FORMER OCCUPATION, HOW LONG, SOURCE OF INCOME. If woman, minor or student—husb's or father's name, occ., worth, Inc. IF FARMER, type (dairy, general, etc.); any other occupation; if so, nature and time devoted.

- Business Connection 1.
- Kind of Business 2.
- Exact Duties 3.
- How Long at Present Job? 4.
- Net Worth 5. \$
- Annual Income 6. \$

IF ANY "YES" ANSWERS, COMPLETE AS NEEDED IN APPROPRIATE SPACE OR ON REVERSE SIDE.

PERSONAL:	NO	YES	
Racial descent (Italian, Negro, etc.) 7.			List with address, No. of children, ages and sex. If divorced or separated, when, please give date of divorce. If habitually drunk, how long in this country? Describe type of residence.
Any difficulty speaking English? 8.			
Habits—Reputation: Business or personal reputation of any driver criticized? 9.			
Any driver drink to intoxication or intoxication? 10.			Describe neighborhood—type bldgs, upkeep, environment, etc. If insured's living conditions crowded or low-grade, explain. IF FARMER, resides on farm? If not, give home address.
NEIGHBORHOOD: Is insured's residence in disrepair or upkept poor? 11.			
Is neighborhood rundown or deteriorating? 12.			
Any unusual neighborhood hazard? (Theft, vice, vand., traffic cong., etc.) 13.			Cover Youthful and Elderly Driver on reverse side. If driver impaired, see over. Cover fully any criticism, violations or losses of any driver. If any losses, when? Who was driving? Who was at fault? (MVR: Be specific if further identification needed.) If any person of driving age does not drive, explain why.
DRIVERS: Any driver under age 25? 14.			
Any driver age 65 or over? 15.			
Impairments: (Mental, Physical, Health) Any driver impaired? 16.			
Driving Record—Losses: Capability or experience of any driver questioned? 17.			
Any past accidents: fires or thefts? 18.			
Any past violations, revocations or suspensions? 19.			If business use, describe how used, territory covered, length of trips, etc. If driven to work, etc., are others carried, used in car pool, etc.? If annual miles under 8,000 or over 12,000, discuss. If more than two cars in family, cover year, make, ownership, drivers, uses. IF A FARMER PICK-UP used for other than own operations, explain.
If car #2 developed, give yr. & make 20.			
CARS—CONDITION—USES: CAR #1 CAR #2			
Any business use? 21.			
Driven to work, school, etc.? 22.			
If so, give one-way miles 23.			
Times per week? 24.			
Estimated annual miles? 25.			
Car in poor condition? 26.			
Car kept on street at night? 27.			
How many cars in family? 28.			

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Form 1141-B

This report is for the purpose of determining the desirability of the named insured as an insurance risk.

CONFIDENTIAL O'HANLON REPORTS

AUTOMOBILE REPORT

Acct. No.

Attention of

Your Classification
Policy No.
Agency

AUTO



SPECIMEN COPY

M	0-Not Requested By Customer
V	1-Attached or Included
R	2-Will Follow
	3-Need Further Identification to order
	See Remarks

Car No. 1

Car No. 2

DRIVERS: Name All Drivers Including Insured	Relationship to Insured	Age or Date of Birth	Sex	Occupation (If Military or Student, see over)	Owns Vehicle?	% Drives Car		Marital Status	Years Driving				MV2
						#1	#2		0-1	1-3	3-5	Over 5	
Insured	Insured												

Explanation of MVR handling on Each Driver

INFORMANTS - TIME KNOWN

INSURED

Direct interview - Who? _____

Resident neighbors _____ Yrs. _____

Former neighbors _____ Yrs. _____

Other _____ Yrs. _____

Previous Reports _____ Yrs. _____

Police records checked? _____

Racial descent? _____

Speaks English well? _____ (If no, cover in remarks)

AGE/SEX of children _____

a. at home _____

b. at school _____

If known less than one year give former address _____

Employer _____

Kind of business _____

Time so employed _____

No. of jobs in past 5 yrs. _____ (If two or more, cover fully in remarks.)

Income _____

Worth _____

If any "Yes" answers to questions 3 through 24 in this section, detail in remarks to whom criticism applies.

If Car #2 developed, give yr. and make _____

	CAR #1		CAR #2	
	NO	YES	NO	YES
1. Is vehicle a sports car?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is vehicle a convertible?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is vehicle in poor condition?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is vehicle altered or "souped-up"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Where is vehicle normally parked? (Garage, Street, Driveway, lot, etc.)				
6. Driven to school, work, depot?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. One way road mileage # times per week				
8. Estimated annual mileage				
9. Share ride, car pool use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Any business use of vehicle?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Vehicle registered in another state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Other cars, go-carts, scooters, etc. in family?			<input type="checkbox"/>	<input type="checkbox"/>
13. Any driver any accidents past five years?			<input type="checkbox"/>	<input type="checkbox"/>
14. Any driver any violations past five years?			<input type="checkbox"/>	<input type="checkbox"/>
15. Deteriorating neighborhood?			<input type="checkbox"/>	<input type="checkbox"/>

	NO	YES
16. Slum, blighted neighborhood?	<input type="checkbox"/>	<input type="checkbox"/>
17. Home environment questionable?	<input type="checkbox"/>	<input type="checkbox"/>
DO THE FOLLOWING APPLY TO ANY DRIVER		
18. Common law marriage (initiated past 5 years)?	<input type="checkbox"/>	<input type="checkbox"/>
19. Moral reputation not good?	<input type="checkbox"/>	<input type="checkbox"/>
20. Any record of criminal violations? (If "Yes" list in remarks approximate dates, details and to whom criticism applies.)	<input type="checkbox"/>	<input type="checkbox"/>
21. Undesirable associates?	<input type="checkbox"/>	<input type="checkbox"/>
22. Undesirable driving habits?	<input type="checkbox"/>	<input type="checkbox"/>
23. Poor financial reputation?	<input type="checkbox"/>	<input type="checkbox"/>
24. Antagonistic - antisocial - uncooperativeness (insured or family member; refuse to cooperate, antagonistic to neighbors, etc.)	<input type="checkbox"/>	<input type="checkbox"/>

If any "YES" answers in this section answer questions and amplify on reverse

ANY DRIVER UNDER 25?

ANY DRIVER OVER AGE 65 OR RETIRED?

ANY IMPAIRED DRIVER?


ANY DRIVER DRINK REGULARLY OR SEVERELY?

- Hand paragraphs A, B, C, D, E
- A. **PAID AND EXPOSURE:** If questions 3 through 11 answered "Yes", discuss. If question 12 "Yes", describe vehicle, and cover who is principal operator. If insured is a woman and husband is not a driver, why?
- B. **CRIMINAL VIOLATIONS:** If questions 13 or 14 are answered "Yes", explain fully.
- C. **DRIVERS:** If any person of driving age does not drive, cover. If driving reputation of any driver in household is poor, cover fully.
- D. **NEIGHBORHOOD:** If questions 15 or 16 are answered "Yes" explain in remarks.
- E. **PERSONAL:** If any driver lives apart from immediate family (i.e., boarding house, college dorm, etc.), or speaks English poorly, or has had two or more jobs in past five years, or if questions 17 through 24 are answered "Yes", explain fully.

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SAMPLE REPORT FROM RETAIL CREDIT COMPANY ADVERTISING
BROCHURE, "PERSONNEL REPORTS."

RETAIL CREDIT COMPANY Report of SALESMAN SELECTION INVESTIGATION			CAUTION TO CUSTOMER: Under the terms of our agreement, this report is submitted with the understanding that it is to be held in STRICT CONFIDENCE. Under no condition of information in this report to be passed on directly or indirectly to the person reported on.
Acct. No. 0345	File No. or Identifier 15467	Completed by CHARLOTTE OFFICE	
Date of Birth: 1-14-65 Name: BOWERS, HUMPHREY ALBERT Address: Charlotte, N.C., 3211 Oak Drive Employer: Excelsior Rubber Company		EXCELSIONS SERVICE <small>All areas and locations, nationwide</small>	
Age or Date of Birth: 5-16-24	Social Security #: 000-00-0000		
SCOPE OF INVESTIGATION			
LOCATIONS			
Present Residence: 1	Present Employer: 1	Former Residence(s): 1	Former Employer(s): 1
Names of cities where this investigation made: Charlotte, N.C.			
<p>Contact was made with subject's present supervisor, knowing 7 years; former supervisor, knowing 3 years; two present residence neighbors knowing 5 years each; two former residence neighbors knowing 10 years each; local banker knowing 10 years; and records at a former business school covering 2 months. Police and Litigation Records also checked.</p> <p style="text-align: center; font-size: small;">CROSS OFFICES INVESTIGATING</p>			
No current handling.			
REPORT OF INVESTIGATION			
EMPLOYMENT RECORD:			
6-14-58 to Present EXCELSION RUBBER CO. Charlotte, N.C.	We have contacted the Excelsior Rubber Company at your request and find that Mr. Bowers is still employed by them. This firm produces rubber insulation for use in the electronics industry. Mr. Bowers was originally an outside salesman calling on electronic equipment manufacturers, but was brought into the office in 1961 as a Sales Correspondent because of antagonism that developed between him and some customers. This condition resulted from the applicant's lack of tolerance when confronted with sales resistance. He was a competent outside salesman with this one exception. He presents a well groomed appearance and is generally considered to be an outgoing type of person; makes a good first impression. His territory was the entire state of North Carolina and his sales trips occasionally required overnight travel. He was on full expenses during these trips and employer never had any cause to question the handling of his expense account. He was not required to do any collecting in this position. His present income is from a straight salary of \$6,000 annually. When an outside salesman, he was on a salary of \$4,800 per year plus commissions, which made his income about \$6,500 annually. There have been no garnishments of his salary and he has missed no time from work. Mr. Bowers has been handling his present job of Sales Correspondent very well, however, this is primarily an inside desk job, requiring no customer contact, and he is just not satisfied with it. Employer is aware that Mr. Bowers is seeking other employment in sales, however they do not feel justified in returning him to their own sales force in view of their past experience.		
3-10-58 to 6-14-58 UNEMPLOYED	This period of unemployment was caused by a mild nervous breakdown. His physician advised a period of complete rest for 2-3 months.		
RETAIL CREDIT COMPANY Form 407-545 U.S.A.	(OVER)	Report of SALESMAN SELECTION INVESTIGATION	

Source: U.S. 90th Congress, 2nd Session,
 House Committee on Government Operations, Special
 Subcommittee on ~~Anti-Trust~~ and the Invasion of
 Privacy. Retail Credit Co. of Atlanta, Ga., Hearings.
 Washington D.C. Government Printing Office, 1969.

5-3-55 to 3-10-58 Mr. Bowers was employed by this janitorial supply firm as a stock clerk, but occasionally made sales ATLAS SUPPLY CO. over the counter to retail trade. His overall Charlotte, N.C. record was satisfactory except he would periodically much as a week's time of work on the average, 3-4 times a year. This was attributed to a nervous stomach. Applicant resigned when he had a mild nervous breakdown, however he had already informed employer of his desire to leave because of his dissatisfaction with his progress. He had hoped to become an outside salesman, but employer would not promote him, recognizing his nervousness when under pressure. At times, subject displayed limited patience with his co-workers and with customers coming into the store. Subject would be eligible for re-employment in a clerical capacity only. Sales experience with this firm was limited to an occasional over-the-counter sale but this so infrequent that employer could not really use this as any indication of his overall sales aptitude. It was felt, however, that his display of limited patience would be a hindrance in sales work for this firm. At time of resignation, his salary was \$400 per month.

EDUCATION: Employment records show subject to be a high school graduate. He entered Moore Business School in Charlotte on 8-10-55, taking a general business course, however dropped out in October, 1955, before completing the course. Reason for dropping the course is now known.

HEALTH-HABITS: Mr. Bowers has good general health with exception of a nervous disorder that has shown up previously when he has been under pressure. This usually results in stomach discomfort. His physician has diagnosed this as "nervous tension." He has had this condition for the past 15 years known. Subject has not suffered a relapse of nervous breakdown, however he will take medication prescribed for relief of tension when he feels it is necessary.

Mr. Bowers is a social drinker, taking a maximum of 2-3 mixed drinks during any one occasion at parties and when friends visit at his home. He has never drunk to any degree of excess and does not use drugs other than medication prescribed for relief of nervous tension.

FINANCES: Subject's net worth of \$12,000 consists of personal property, equity in his home, and savings. He maintains a close control over his personal finances and does not gamble or speculate in the stock market. Local bank reports a medium 3-figure checking account. His financial and credit standing is good. Suits, judgments, and bankruptcy records were checked and found clear. We find no indication of any present or past financial difficulty. His wife, Betty, is a housewife and has no independent income.

PERSONAL-REPUTATION: Mr. Bowers is married and has two children, ages 10 and 7. They live in their own home located in a nice middle-class residential section. Environment appears good. Prior to about five years ago, he lived in the near-by rural community of Homestead for many years. He also owned his home at this location and it was situated in a well kept area located just outside the city limits. Subject sold this home in order to be closer to work. He enjoys a fine reputation and standing at both locations and his associates are respectable. His social activities are limited to attending church and entertaining friends at his home. Mr. Bowers' wife is a capable woman and a definite asset to his social and business standing.

POLICE RECORDS: Police records were checked and revealed no record.

CONFIRMATION: Health information confirmed by present employer, former, employer, and personal associates.

JHN

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