

~~understandable to consumer if the explanation of what credit scores are was disclosed in the first row of the this section.~~

~~The final rules retain the proposed order of the credit report information in model forms H-6 and H-7 of the Board's rules and Forms B-6 and B-7 of the Commission's rules. The Agencies believe that disclosing the credit score that is used in setting the material credit terms or reviewing the account is the primary purpose of the provisions of section 1100F of the Dodd-Frank Act. By placing the credit score that is applicable to the consumer in the first row of the section "Your Credit Score and Understanding Your Credit Score," the Agencies believe that consumers are more likely to continue reading the notice to find out additional information about the credit score.~~

*Attaching the credit score information to the current model form.* One industry commenter asked the Agencies to clarify that a creditor may staple or append the credit score information using a supplemental document to a current model form on general risk-based pricing (H-1 and B-1) or an account review notice (H-2 and B-2). The Agencies note that information contained on the first page of H-1 and B-1 is the same as the information contained on the first page of H-6 and B-6. Likewise, the information contained on the first page of H-2 and B-2 is the same as the information contained on the first page of H-7 and B-7. The difference between H-1 (or B-1) and H-6 (or B-6) is the inclusion of the credit score information contained in the section "Your Credit Score and Understanding Your Credit Score" that is contained on the second page of H-6 and B-6. Likewise, the difference between H-2 (or B-2) and H-7 (or B-7) is the inclusion of the credit score information contained in the section "Your Credit Score and Understanding Your Credit Score" that is contained on the second page of H-7 and B-7. Thus, the Agencies believe that a creditor will be deemed to have used H-6 or B-6 if it staples or appends to H-1 or B-1 the credit score information contained in the section "Your Credit Score and Understanding Your Credit Score" that is contained on the second page of H-6 and B-6. Instruction 3. to Appendices H and B sets out the modifications that may be made to the model forms without losing the benefit of safe harbor. The combined H-1 or B-1 and attachment must comply with Instruction 3. to Appendices H and B for the creditor to retain the safe harbor for using H-6 or B-6. Likewise, a creditor will be deemed to have used H-7 or B-7 if it staples or appends to H-2 or B-2 the credit score information contained in the section "Your Credit Score and Understanding Your Credit Score" that is contained on the second page of H-7 and B-7, in a format substantially similar to H-7 and B-7. The combined H-2 or B-2 and attachment must comply with Instruction 3. to Appendices H and B for the creditor to retain the safe harbor for using H-7 or B-7.

~~*Use of graphs or table format.* An industry commenter requested that the Agencies clarify that creditors may use a graph or table format to provide the information in the model forms without losing the safe harbor. The commenter stressed that graphs, tables, and other visual devices may be clearer and more useful to consumers.~~

~~Although the Agencies certainly encourage simplicity, one of the key benefits of a safe harbor is uniformity. Thus, it is difficult to make a blanket statement that creditors may substitute graphs or tables without losing the safe harbor.~~