



RE: Proposed Access Rule 123

Dear Committee Members:

You will find below comments presented in response to the proposed Rule 123 ("Proposed Policy") regarding access to court information. The comments are from First Advantage SafeRent, Inc. ("SafeRent") a wholly owned subsidiary of First Advantage Corporation ("FADV"), publicly traded on the NASDAQ under the abbreviation FADV. FADV and its affiliated companies are leaders in providing risk mitigation and business solution services. SafeRent specifically assists the multi-family housing industry in assessing risks of potential tenants and employees by reselling credit reports and providing public record information, including information derived from public records housed by the Arizona Courts. SafeRent is a consumer reporting agency bound to follow the federal Fair Credit Reporting Act ("FCRA") and its state law equivalents.

SafeRent congratulates you on finding a healthy balance between providing access to public records and safeguarding personal information of Arizona residents. Particularly, we find that the proposed rules on access to data in bulk are fair and even handed providing us with enough identifiers to accurately match records to consumers; however, SafeRent respectfully requests that one item in the bulk access proposed rules be reconsidered. The proposed contract requirement that updates be implemented in 48 hours will hinder our ability to meet certain duties under the FCRA. By way of explanation, the FCRA requires that we utilize "reasonable procedures for maximum possible accuracy" in reporting information on consumers. As you can imagine, when we reformat data from public sources into a readable format for our clients, this requires us to put the data set under a thorough quality control process in order to assure that the information maintains its original meaning and integrity. Such testing takes time. Therefore, we respectfully request a 10 business day window to download, test, and ultimately implement data set updates from Arizona courts. SafeRent feels this is a reasonable request in order to maintain maximum possible accuracy, comply with federal law, and protect consumers from preventable errors appearing in their consumer reports.

Please feel free to contact me with any questions at (301) 881-3598, extension 1925. Again, we thank you for maintaining reasonable access to records overall by providing appropriate secondary identifying information.

Very truly yours,

A handwritten signature in blue ink that reads "Jamie A. Crabtree".

Jamie A. Crabtree, Director of Regulatory and Legislative Affairs