

**Stephanie Findish**  
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Amherst, Ohio 44001

September 14, 2006

Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal  
Reserve System  
20<sup>th</sup> Street and Constitution Avenue N.W.  
Washington, D.C. 20551

Robert E. Feldman  
Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20429

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G. Street N.W.  
Washington, D.C. 20552

Mary Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA. 22314

Federal Trade Commission  
Office of the Secretary  
Room 159-H (Annex C)  
600 Pennsylvania Avenue N.W.  
Washington, D.C. 20580

Office of the Comptroller of the Currency  
250 E Street, S.W.  
Mail Stop 1-5  
Washington, D.C. 20219

Julia Davenport  
General Counsel  
HSBC Retail Services  
Corporate Headquarters  
2700 Sanders Road  
Prospect Heights, IL 60070

HSBC Holdings PLC  
8 Canada Square  
London, E14 5HQ

Re: **Procedures to Enhance the Accuracy and Integrity of Information Furnished  
to Consumer Reporting Agencies Under Section 312 of the FACT Act**

Dear Agency Representatives:

I have carefully reviewed the HSBC May 22, 2006, letter sent to the agencies listed above. I am no one except a frustrated customer and grandmother but what is stated in HSBC's letter, while creative, is not the truth, but has a great spin.

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Let me explain. I applied for and received 3 credit cards from HSBC (although at the time I did not know it was HSBC - the accounts were for Orchard Bank). All the information I supplied was my personal information and entirely correct. For some reason the first card was issued in my name and the other two cards issued in my son's name ( or maybe my ex-husband from 25 years ago). HSBC does not check or verify any facts. When I applied for these cards, I was very ill. I did not notice the different names on the accounts. When I received the cards, I signed the back and until I was asked for identification at a retail store did not know the cards were wrong. This was many months into using and paying the credit card accounts. I called Orchard Bank (HSBC) to have the error corrected. No one would or could discuss this problem with me because I was not Thomas Findish. When my son Thomas called, no one would discuss the problem with him because his information did not match the account information. There were no supervisors available to handle this matter. I continued to pay these accounts on time, paying more then the minimum payment every month. All checks clearly stated my correct name and address and were signed by me. During my efforts to correct this error, I was yelled at, cursed at, threatened to be put in jail for fraud and literally punished for HSBC's mistake. I stopped calling because magically all notes of previous conversations disappeared and I would have to start all over again. I was ill and the stress was intense.

In May I decided to stop paying all the accounts and sent a letter to HSBC stating I did not have a telephone, please straighten out the account with the correct name and issue a credit card in my name. I could not determine any other way to get their attention.

The telephone calls started. How could HSBC call me if I don't have a telephone, you ask? I will tell you. Somehow, HSBC had decided that my minor (12 years old) grandson's cell phone (that is part of a family plan) is the number to call. This number was never used on any application submitted to HSBC - (as a matter of fact, it did not even exist as this is a new plan and number). No one has authorized HSBC to use this number. HSBC has called this number almost 100 times in one month. I told HSBC to stop calling this cell phone number on August 1, 2006, and I requested all communications be in writing since June 25, 2006. I have sent 6 certified letters (return receipt requested) that explains my problem. The Federal Communications Commission has extensive rules regarding the use of anyone utilizing a cell phone to collect accounts. Consequently I have filed a complaint with the FCC.

HSBC continues to ignore the law. I have created a log of the dates and times of all telephone calls (A copy is enclosed) and have the cell phone bills to verify this information. The most insulting fact is that if I wish to discuss this matter with HSBC I must return a call to a non-800 number and pay long distance charges to have HSBC yell at me. Section 808(5) of the Fair Debt Collections Practices Act provides that a debt collector engages in unfair and unconscionable collection practices when they cause a consumer to incur charges for a communication if the true purpose of the call is concealed. HSBC never leaves a message. The

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“predictive dialer” disengages the call after 6 ½ rings. If the phone is picked up there is dead air and no one is there. The Telephone Consumer Protection Act regulations prohibit any person or entity from using an “predictive dialer” to initiate a telephone call to any number assigned to a wireless telephone unless the prior express consent of the called party is obtained. HSBC has been informed they are calling a cell phone. Consent has never given to HSBC to call the cell phone. To date, I have not received even one letter that deals with my problem.

Now to the point of this letter. HSBC would like you to amend the procedure for correcting information reported to credit reporting agencies. I direct you to B(1)f of HSBC’s letter. Pursuant to 15 U.S.C. 1681s-2(b)(2), HSBC must respond to a consumer dispute within 15 to 20 days. I have been complaining for almost 3 years. I now know why everything disappears from their computers. As stated in there letter, “Those [disputes] received directly from the consumers, however, are much more labor intensive and time consuming . . . Furnishers often have to engage in thorough research and investigation just to learn what the dispute is. . . “ Instead of thorough research and investigation, you just wipe the dispute out of the computer and it does not exist. Much more cost and time efficient. All the information on these 3 accounts is reported on my credit report, under my social security number and utilizes all my information – not my son’s. Yet after 3 years I do not have a credit card in my name.

This problem results from the errors of HSBC – not consumers. Someone pushed a wrong button and someone at HSBC should be responsible for correcting the problem. HSBC now wants to put the onus of fixing HSBC’s errors on the consumer who has no control over HSBC’s button pushing, computer erasing employees.

Please do not allow HSBC to be off the hook for correcting consumer disputes. I do not believe it will make any difference to HSBC, but somewhere down the road, HSBC must be made to face their own responsibilities.

Very truly yours,



Stephanie Findish

:sf w/encl.

### HSBC Cell Phone List

8/1/06	9:18 a.m.	800.684.8429	Would not identify caller - told would remove cell phone from list
8/1/06	9:36 a.m.	800.684.8429	Asked for identification and was hung up on - would not answer questions as to identification and on whose behalf they were calling hung up on and was talking to empty air
8/1/06	2:06 p.m.	800.684.8429	Telephone call - would not answer
8/1/06	5:14 p.m.	800.684-8429	
8/1/06	5:16 p.m.	800.684-8429	
8/1/06	5:40 p.m.	800.684-8429	Chad would not identify the company at first - when identified as HSBC and I told him I would record the conversation, he stated that HSBC does not allow conversations to be recorded and he would not give me the address
8/1/06	5:48 p.m.	800.684-8429	Mario gave me the address and stated that he would remove the number from the auto dialer system
8/1/06	8:49 p.m.	800.684.8429	Refused to answer
8/2/06	2:09 p.m.	800.684.8429	Refused to answer
8/2/06	6:01 p.m.	800.684.8429	Refused to answer
8/3/06	8:17 a.m.	800.684.8429	Refused to answer
8/3/06	2:55 p.m.	800.684.8429	Refused to answer
8/3/06	6:23 p.m.	800.684.8429	Refused to answer
8/3/06	7:58 p.m.	800.684.8429	Refused to answer
8/4/06	10:19 a.m.	800.684.8429	Refused to answer
8/4/06	1:51 p.m.	918.384.4100	Refused to answer
8/4/06	4:43 p.m.	800.684.8429	Refused to answer
8/5/06	8:55 a.m.	800.684.8429	Refused to answer
8/5/06	12:20 p.m.	800.684.8429	Refused to answer
8/5/06	2:45 p.m.	800.684.8429	Refused to answer
8/6/06	9:25 a.m.	800.684.8429	Refused to answer
8/6/06	12:51 p.m.	800.684.8429	Refused to answer
8/6/06	3:00 p.m.	800.684.8429	Refused to answer
8/6/06	5:35 p.m.	800.684.8429	Refused to answer
8/6/06	8:50 p.m.	800.684.8429	Refused to answer
8/7/06	8:23 a.m.	800.684.8429	Refused to answer
8/7/06	1:56 p.m.	918.384.4100	Refused to answer
8/7/06	7:29 p.m.	800.684.8429	Refused to answer

8/7/06	8:18 p.m.	800.684.8429	Refused to answer
8/8/06	8:44 a.m.	800.684.8429	Refused to answer
8/8/06	1:44 p.m.	800.684.8429	Refused to answer
8/8/06	6:11 p.m.	800.684.8429	Refused to answer
8/8/06	9:01 p.m.	800.684.8429	Refused to answer
8/9/06	8:52 a.m.	800.684.8429	Refused to answer
8/9/06	3:12 a.m.	800.684.8429	Refused to answer
8/9/06	7:14 a.m.	800.684.8429	Refused to answer
8/9/06	8:23 a.m.	800.684.8429	Refused to answer
8/10/06	10:29 a.m.	800.684.8429	Refused to answer
8/10/06	2:03 a.m.	800.684.8429	Refused to answer
8/10/06	5:36 a.m.	800.684.8429	Refused to answer
8/10/06	8:07 a.m.	800.684.8429	Refused to answer
8/18/06	2:14 p.m.	918.384.4100	Refused to answer
8/23/06	3:06 p.m.	918.384.4100	Refused to answer
8/24/06	6:32 p.m.	918.641.1910	Refused to answer
8/24/06	8:33 p.m.	918.641.1910	Refused to answer
8/24/06	7:26 p.m.	918.641.1910	Refused to answer
8/25/06	9:48 a.m.	918.641.1910	Refused to answer
8/25/06	6:14 p.m.	918.641.1910	Refused to answer
8/26/06	10:22 a.m.	918.641.1910	Refused to answer
8/28/06	8:15 p.m.	918.641.1910	Refused to answer
8/29/06	6:26 p.m.	918.641.1910	Refused to answer
8/30/06	11:58 p.m.	918.641.1910	Refused to answer
8/30/06	6:05 p.m.	918.641.1910	Refused to answer
8/30/06	7:54 p.m.	918.641.1910	Refused to answer
8/31/06	8:38 a.m.	918.641.1910	Refused to answer
8/31/06	9:54 a.m.	918.641.1910	Refused to answer
8/31/06	11:41 a.m.	918.641.1910	Refused to answer
8/31/06	4:07 p.m.	918.641.1910	Refused to answer
8/31/06	7:11 p.m.	918.641.1910	Refused to answer
9/1/06	8:16 a.m.	918.641.1910	Refused to answer
9/1/06	5:42 p.m.	918.641.1910	Refused to answer
9/1/06	7:21 p.m.	918.641.1910	Refused to answer
9/1/06	8:40 p.m.	918.641.1910	Refused to answer
9/2/06	8:51 a.m.	918.641.1910	Refused to answer
9/2/06	10:47 a.m.	918.641.1910	Refused to answer
9/2/06	1:17 p.m.	918.641.1910	Refused to answer
9/3/06	8:42 a.m.	918.641.1910	Refused to answer
9/3/06	10:18 a.m.	918.641.1910	Refused to answer
9/3/06	12:02 p.m.	918.641.1910	Refused to answer
9/3/06	12:11 p.m.	918.641.1910	Refused to answer
9/5/06	11:41 a.m.	918.641.1910	Refused to answer
9/5/06	6:09 p.m.	918.641.1910	Refused to answer
9/5/06	8:43 p.m.	918.641.1910	Refused to answer

9/6/06	6:07 p.m	918.641.1910	Refused to answer
9/6/06	8:42 p.m.	918.641.1910	Refused to answer
9/7/06	8:47 a.m	918.641.1910	Refused to answer
9/7/06	11:42 a.m.	918.641.1910	Refused to answer
9/7/06	6:26 p.m.	918.641.1910	Refused to answer
9/7/06	8:08 p.m.	918.641.1910	Refused to answer
9/8/06	8:02 a.m.	918.641.1910	Refused to answer
9/8/06	1:54 p.m.	918.641.1910	Refused to answer
9/8/06	5:55 p.m.	918.641.1910	Refused to answer
9/8/06	7:31 p.m.	918.641.1910	Refused to answer
9/9/06	8:03 a.m.	918.641.1910	Refused to answer
9/9/06	8:53 a.m.	918.641.1910	Refused to answer
9/9/06	10:55 a.m.	918.641.1910	Refused to answer
9/9/06	12:26 a.m.	918.641.1910	Refused to answer
9/9/06	1:21 p.m.	918.641.1910	Refused to answer
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9/11/06	7:55 p.m.	918.641.1910	Refused to answer
9/12/06	8:14 a.m.	918.641.1910	Refused to answer
9/12/06	6:12 p.m.	918.641.1910	Refused to answer
9/12/06	8:31 p.m.	918.641.1910	Refused to answer
9/13/06	9:00 a.m.	918.641.1910	Refused to answer