

**LETTER CIRCULAR NO. 2022- 15
SERIES OF 2022**

DATE : 1 DECEMBER 2022

TO : SUBMITTING ENTITIES IN PRODUCTION

**SUBJECT : ADDITIONAL REQUIREMENTS SPECIAL SUBMISSION OF
SEPARATE FILE TO UPDATE AND/OR CORRECT
DISPUTER'S CREDIT DATA**

I. Background

On 07 December 2021, Letter Circular 2021-013 was issued directing Submitting Entities (SE) to submit "Special submissions" files to update or correct Borrowers' Credit Information (Special Submission). This Special Submission shall be submitted separately from the Regular Contribution File submitted on a monthly basis. All relevant data to be corrected pertaining to a dispute shall be contained in the Special Submission and future Regular Contribution Files shall be consistent with the corrections made therein.¹

One of the rights of Data Subjects is to dispute erroneous, incomplete or misleading credit information as well as its right to a simplified dispute resolution process protected by RA 9510 or the Credit Information System Act. Special Submissions are given priority in the uploading of credit data in the CIC database given their importance in resolving disputes.

During the implementation of the said Circular, CIC still detected a number of Submitting Entities (SEs) which submitted regular submissions still containing "Special submissions" instead of being submitted separately. This practice leads to inordinate delays in the resolution of disputes since the correction file has to be traced amidst the voluminous data contained in the regular submissions and excised through an intense manual process.

Consequently, there arises a need to reinforce the importance of the above-mentioned Circular and to require additional changes in the submission structure to improve the processing of Special Submissions and ultimately resolve disputes faster.

II. Additional Guidelines in Submission

¹ Paragraph II of Letter Circular 2021-03

In addition to the guidelines set forth in Letter Circular No. 2021-013, SEs are hereby enjoined to observe the following:

1. Special Submissions should **NOT** be included in the Regular Submissions. Otherwise, the same shall not be considered as a Special Submission and will require the concerned SE to re-submit the appropriate Special Submissions anew separately.
2. An updated transmittal template, marked as Annex "A", shall be used for every Special Submissions which includes the file size and number of records.
3. SEs must furnish a copy of the transmittal template to the Dispute Resolution Team through dispute@creditinfo.gov.ph for monitoring and recording purposes.

Willful defiance to comply with Letter Circular 2021-013 and/or this Circular shall subject the erring SEs to the appropriate sanctions or penalties under RA 9510, without prejudice to any escalatory or legal actions that CIC or the concerned Subject Disputer may undertake. Non-compliance or late compliance shall likewise be considered as willful defiance if despite notice, the concerned SEs still fail to comply.

Should the SE need further technical assistance on Special Submissions, it may contact its assigned CIC Data Operator for support or email cis-support@creditinfo.gov.ph.

Adherence to the above guidelines ensures the efficient processing of special submission for the immediate resolution of disputes while ensuring the accuracy and reliability of the CIS database.

For your guidance and strict compliance.



ATTY. BEN JOSHUA BALTAZAR
CIC President and CEO



ANNEX A

TRANSMITTAL LETTER

**SPECIAL SUBMISSION OF SEPARATE FILE TO UPDATE/CORRECT
DISPUTER'S CREDIT DATA**

Respectfully submitting the attached Special Submission to update/correct file for
(NAME OF DISPUTER) with the following verification details:

1. File name: _____
2. Subject provider number of the Disputer: _____
3. Contract provider number of the Disputer: _____
4. File size: _____
5. Number of Records: _____

Authorized Representative

Date