

# United States Senate

WASHINGTON, DC 20510-2509

March 23, 2026

The Honorable Andrew N. Ferguson  
Chairman  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Chairman Ferguson:

I write to urge the Federal Trade Commission to investigate the pricing practices of the Fair Isaac Corporation (FICO), which holds a dominant position in the business-to-business credit scoring market and has engaged in a pattern of extraordinary price increases that harm American consumers. I have twice called on the Department of Justice Antitrust Division to investigate these practices. The FTC's consumer protection and competition authority make it equally well-positioned to investigate anticompetitive behavior at FICO.

FICO maintains a dominant market share in the credit scoring market, with its product used by approximately 90% of lenders.<sup>1</sup> This position is reinforced by its longstanding status as the sole credit score accepted by Fannie Mae and Freddie Mac for conforming mortgage loans, despite the forthcoming welcome addition of its first competitor in VantageScore.<sup>2</sup> Using this government-backed market dominance, FICO has increased the wholesale price of its mortgage credit score from \$0.60 per score to \$10.00 per score over the past five years—a sixteen-fold increase, representing a compound annual growth rate of approximately 100%.<sup>3</sup>

For 2026 alone, FICO doubled its per-score price from \$4.95 to \$10.00—a more than 100% increase for the identical product offered in 2025.<sup>4</sup> This single increase has the potential to raise mortgage credit score costs across the industry by approximately \$500 million.

These costs are ultimately borne by borrowers. They are especially damaging to first-time homebuyers, who often pay for multiple credit checks across several loan applications before successfully purchasing a home. Each standard mortgage credit pull requires three FICO scores—one from each major credit bureau. But many of these applicants never actually receive a loan. Some fail to qualify for a loan, while others never find a home they can afford. As a result, FICO collects substantial revenue from consumers who

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<sup>1</sup> <https://www.cnbc.com/2025/10/02/fico-provider-is-shaking-up-its-credit-score-business-its-stock-is-surging.html>

<sup>2</sup> <https://www.inman.com/2025/11/07/fannie-and-freddie-still-havent-rolled-out-new-credit-score-change-heres-why/>

<sup>3</sup> <https://www.equifax.com/newsroom/all-news/-/story/equifax-statement-on-the-costs-of-credit-scores-and-credit-reports/>

<sup>4</sup> <https://www.equifax.com/newsroom/all-news/-/story/equifax-statement-on-fico-2x-price-increase-for-2026-and-mortgage-direct-license-program/>

never close on a home. Meanwhile, FICO's Scores segment revenue grew 27% in fiscal year 2025 to \$1.17 billion, with operating margins of 88%.<sup>5</sup> The company's CEO has received over \$35 million in total annual compensation, all on the back of a state-supported monopoly.<sup>6</sup>

FICO has suggested that its royalty constitutes a negligible share of overall closing costs.<sup>7</sup> But the relevant question is not whether the charge is small relative to other fees. Instead, we investigate whether the charge is justified by competitive market forces or is instead an exercise of monopoly pricing power. An 88% operating margin and a compound annual growth rate of 100% in per-score pricing over five years are not hallmarks of a competitive market.

These facts warrant scrutiny under the FTC's authority to investigate unfair methods of competition and unfair or deceptive acts or practices. I urge you to open an investigation at the earliest opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Hawley". The signature is fluid and cursive, with a large loop at the end.

Josh Hawley  
United States Senator  
Chairman, Subcommittee on Crime and Counterterrorism  
Committee on the Judiciary

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<sup>5</sup> <https://investors.fico.com/static-files/4dd43bd8-b07f-472c-9e53-5cb224ec9acd>

<sup>6</sup> <https://aflcio.org/paywatch/FICO>

<sup>7</sup> <https://www.ficoscore.com/myth-or-fact-ficor-scores-cost-less-slice-pizza>