

## FINAL SUMMARY INTRODUCTION

### *Who participated?*

During the 115 days the discussion was open on RegulationRoom, a total of 8,480 unique visitors came to the site. There were 12,629 total visits, with people spending an average of 3.48 minutes on the site. Of the 10 topic posts, the average time on the page was longest for “Questions about phones & mobile phones in debt collection” (4.05 minutes) and shortest for “Telling consumers what's happening with their debts” (2.50 minutes). The text of the ANPRM was viewed a total of 586 times with an average time on page of 4.38. Anyone could read material on the site, but registration was required to participate in the discussion. 377 people registered during the time the discussion was open.

286 people responded to a survey that asked people about their interest in the discussion. This survey appeared when people made their first comment or endorsement. 83% of those who responded said that they had never previously submitted a comment in a federal rulemaking. A second survey question asked people which category best described them. Three main categories could be chosen: consumer; involved in debt collection; something else.

Consumer: 191 people chose this category. They were asked to further describe their situation and, if they had an experience with a debt in collection, to describe the type(s) of debt; those categories are listed below. People could select more than one of the following categories, which is why the numbers add up to more than 190.

- 135 – I have/had a debt in collection
- 69 – Someone in my family has/had a debt in collection
- 74 – I've made a complaint about a debt collector to a government agency or consumer protection organization
- 7 – I am (or my spouse or partner is) an active US military servicemember, or I had trouble with debt collection while I (or my spouse or partner) was a servicemember
- 21 – I'm the victim of identity theft
- 35 – I'm 62 or older
- 29 – Other; further described as:
  - 100% DAV [disabled American veteran]
  - A neighbor who has since moved away has had her debts turned over to a collection agency.
  - Bogus flood insurance posted on my mortgage
  - Burglary of personal I.D. information - EVERYTHING, name, DOB, SS, address, previous address, email, which credit cards I have.
  - Continuous calls for other people's debts
  - Debt collectors are calling my phone number looking for someone I do not know
  - disabled
  - Do not owe money. Common last name, repeated calls from collectors looking for someone else, collector ignores DNC requests
  - I also work with at risk and low income folks to help get their debt on track (a non-profit)

- I am also a Mediator for consumer protection and deal with debt collection and consumers as well.
- I did not have a debt but the debt collector thought I did.
- I got a new phone number and debt collectors keep calling me to speak to the previous owner of the number. They won't stop calling
- I have a common last name, and that's all it takes to be bombarded with collection calls.
- I have been politically active in my state concerning consumer finance.
- I have had adverse action taken against me for another person's debt
- I helped a friend with a debt collection he knew nothing about
- I was given a phone number of someone who is in debt collection and I have received threatening phone calls from collection agent
- I work for an organization which assists victims of identity theft.
- Large student loan debt
- Living in a home that someone with a debt lived in a long time ago.
- My cell phone number used to be owned by someone who has an outstanding student loan debt; collectors keep calling me!
- My former employer alleges that I owe them an overpayment of wages from spring of 2012.
- N/A
- Paying a debt that I may not get ownership of.
- Previously employed in pre-collection dept of medical billing office.
- Read about the issue in Pro Publica piece
- Someone keeps calling my phone number asking for "Sean," when no one by that name has ever lived here. And they keep calling.
- Target of debt due to common first and last name
- worked at a debt collection law firm as 'legal assistant' or 'paralegal'

If you have experience with a debt in collection, please describe the type(s) of debt. (More than one could be selected.)

- 66 – Medical
- 33 – Utilities and telecom
- 39 – Student loan
- 97 – Credit card
- 13 – Pay day loan
- 16 – None
- 25 – Auto
- 23 – Mortgage
- 27 – Court judgment
- 35 – Other

Involved in debt collection: 65 people chose this category. They were asked to further describe their business or the business they work for. People could select more than one of the following categories, which is why the numbers add up to more than 65.

My business/the business I work for is best described as:

- 15 – Creditor collecting own debts
- 1 – Debt buyer
- 31 – Debt collector recovering on the debts of others
- 9 – Debt collection law firm/attorney
- 9 – Other; further described as:
  - 3rd Party Website Vendor
  - Bank
  - Compliance Officer for debt collection law firm
  - Consumer Advocate, Debt Buyer and Debt Collector
  - Financial Advisor trying to figure out a problem for a client
  - I am a consultant and many of my clients are in the debt collection industry.
  - Institute of Higher Education
  - Sheriff's Office where we served debt collection processes
  - University which hires third party collection agencies.

In your best estimate, how many people work in the debt collection part of your business/the business you work for?

- 25 – Fewer than 20
- 10 – Between 20 and 50
- 27 – More than 50
- 3 – I don't know

Something else: 40 people chose this category. They were asked to further describe their interest. People could select more than one of the following categories, which is why the numbers add up to more than 40.

- 3 – I work for a consumer protection organization
- 1 – I work for a not-for-profit debt relief and consolidation or credit counseling organization
- 5 – I work for a state, local, or tribal government
- 2 – I work for a federal agency
- 3 – I'm a researcher
- 24 – Other: further described as:
  - A consumer who has worked on credit decisioning and identity authentication initiatives with the 3 CRAs.
  - A plethora of knowledge and experience on both sides of the pen, I've worked in the mortgage industry, debt collections, & other
  - attorney who defends consumer collection suits
  - banker
  - Bankruptcy lawyer
  - Financial Literacy Counselor for a Domestic Violence shelter
  - I am a consumer and a material interest income beneficiary of public debt and outstanding preferred debt of issuing banks.

- I am a consumer, a lawyer occasionally involved in debt collection, and a victim of identity theft.
- I am a current income beneficiary of an original creditor and a consumer
- I am an academic focused on consumer economics.
- I am an attorney who focuses on defending consumers against collection litigation
- I do not owe a cent. I am getting calls for someone who has never ever lived here.
- I have no debt other than what is current on my credit cards
- I have the same name as someone who doesn't pay his bills
- I own a mortgage company
- I work for an association
- I worked in the Business Operations side of debt collections several years ago. I have followed the industry since then.
- Law Student & Former Intern at Consumer Law Organization
- Mortgage Banker
- Mortgage Broker
- My firm covers and influences the world of professional debt collection
- parents of children in debt being bugged by their collection agencies
- physician
- Work in the finance industry

NOTE: RegulationRoom does not attempt to verify that people correctly identify their interests. For this reason, whenever the summary states a commenter's interest, the description is based solely on information given by the commenter.

Of the 377 people who registered while the discussion was open, 224 people posted 956 comments and endorsed 232 comments. Site moderators posted a total of 250 responses. Six people who did not write their own comment endorsed someone else's comments.

Comments by users were distributed as follows (these totals do not include moderator posts):

- 97 – Telling consumers what's happening with their debts
- 78 – The "validation notice" sent to consumers
- 108 – When consumers dispute a debt
- 33 – Making sure debt collectors & buyers have info about the debt
- 143 – Unlawful collection practices
- 169 – Questions about phones & mobile phones in debt collection
- 35 – Questions about email, texting & social media in debt collection
- 54 – Talking to other people about the consumer's debt
- 64 – Old debts
- 175 – Debt collection litigation