

EXHIBIT C

Debt Collection Activities Study **Follow-up outreach on collection activities and costs**

Thank you very much for completing our written questionnaire and for agreeing to participate in follow-up conversations with us. The information that you provide will help the CFPB better understand the burden of potential regulations affecting debt collection.

We hope to have discussions with a relevant representative or representatives from your organization who are familiar with operational costs and with the specific business processes discussed below. Participation in these discussions is voluntary, and we expect each conversation to last approximately 90 minutes.

As with the written survey, the results of the study may be used to develop a proposed rulemaking or other documents, but **your institution will not be identified** and we will not disclose information in a manner allowing attribution to specific institutions or individuals except to the extent required by law.

Below is a list of topics that we will address in our discussions with you, which generally tracks the list of questions in the written survey that you completed. We may not cover every topic; however, we hope this list will serve as a useful guide for the types of topics that we would like to cover.

1. Basic questions about the business, including employment, training, labor costs, types of debt collected, any lines of business other than debt collection, and how your organization fits into the industry.
2. Questions about specific business processes.

For each of the following business activities, we would like to better understand the fixed and variable costs associated with the activities, including amounts paid to vendors as well as your labor costs and other costs, as well as other operational considerations in pursuing the activity.

- a. Maintaining and using account information, including updates to your systems and transfers of data into and out of your systems.
- b. Calling consumers, including the costs of maintaining and using a dialer, collector productivity, call recording, speech analytics and similar technology, voicemail usage, call restrictions, and caller id.
- c. Written communications, including the cost of mailings, timing and frequency of letters, and use of email and/or other electronic communications.

- d. Disputes, including the costs of processing and investigating disputes.
- e. Accepting payments, including the use of any online payment portal and charging post-charge off fees to consumers.
- f. Skip tracing and otherwise supplementing account information.
- g. IT services for system maintenance, etc.
- h. Furnishing data to credit bureaus.
- i. Litigation, including the cost of suing a consumer to recover a debt and the process of deciding whether to sue a consumer.
- j. Operational changes and other costs associated with compliance with federal and state laws.
- k. Other significant sources of operational costs not discussed above.

As required by federal law, the Office of Management of Budget has approved these questions under the Paperwork Reduction Act. The OMB control number for this collection is 3170-0032.

Also, a federal law called the Privacy Act directs how the CFPB collects, keeps and shares your personal, private information- including the personal information contained in your answers to these questions. Your participation is completely voluntary, and is subject to the CFPB privacy policy that can be found on our website, consumerfinance.gov. The CFPB will also treat the information received consistent its confidentiality regulations at 12 CFR § 1070.

If the responses you provide to this study are requested under the Freedom of Information Act, the Bureau will withhold such responses to the extent that it determines that they constitute trade secrets or confidential commercial information that you would not ordinarily make public. The Bureau will deem any such trade secrets or confidential commercial information to be “confidential information” for purposes of the Bureau’s confidentiality rules at 12 CFR § 1070.40 et seq.