

Regulation F Debrief for Connecticut AAHAM



Presented by: George Buck, ARM Consultant and Leslie Bender,
Senior Counsel

Presentation Date: Monday, November 8, 2021



AGENDA

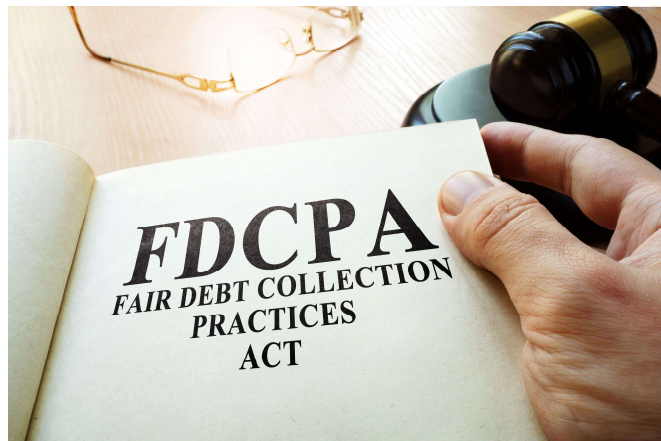
- §1006.2 Definitions
- §1006.6 Communication in Connection with Debt Collection
 - The Use of Email & Text
 - Consumer Preference Management
- §1006.14 Harassing, Oppressive & Abusive Conduct (Call Frequency)
 - Why Consent Matters
- §1006.34 Model Validation Notice

Deadline for compliance is set.

November 30, 2021 is the confirmed deadline for compliance.

CFPB encourages industry to come into compliance earlier but safe harbors and/or rebuttable presumptions begin November 30, 2021.

- § 1006.2 - Definitions



§ 1006.2(b) Attempt to Communicate

- Any act to initiate a communication or other contact about a debt through any medium
- Limited Content Message (LCM) is an attempted communication but it is not a communication
- **[Important note: although industry had requested it, the CFPB did not make the LCM formula for communicating available for email or text – only voicemails.]**
- Attempts apply to electronic communication, but not counted as part of call frequency.
- Guidance:
- **Ringin g phone is an attempt to connect.**
- **Attempts can still be the basis of an FDCPA claims under §1692d, e or f.**

5

§ 1006.2(e) Consumer

- (e) Consumer means any natural person, whether living or deceased, obligated or allegedly obligated to pay any debt. For purposes of § 1006.6, the term “consumer” includes the persons described in § 1006.6(a).
- § 1006.6(e) – includes:
 - (1) a consumer’s spouse;
 - (2) a consumer’s parent if the consumer is a minor;
 - (3) a consumer’s legal guardian;
 - (4) the executor or administrator of the consumer’s estate if the consumer is deceased; and
 - (5) a confirmed successor in interest for as defined in Reg Z & X.

6

§ 1006.2(j) Limited Content Message

- A voice mail message that includes all required content and option content:
 - **Required content:**
 - Business name (as long as the name does not suggest in debt collection business);
 - Request consumer reply to message;
 - The name of one or more natural persons to whom the consumer can reply at office of the debt collector; and
 - The telephone number to respond.
 - **Optional Content:**
 - A salutation;
 - Date and time of the message;
 - Suggested dates and times for consumer to reply;
 - A statement if the consumer replies, the consumer can speak to any of the company's representatives or associates.
- *Unknown: If state law permits "aliases" for your "natural persons" could those aliases be the names left in the LCM.*

7

- § 1006.6 Communication in Connection with Debt Collection



8

§ 1006.6(d)(4) & (5) – Email and Texting are Permitted under Certain Restrictions

- ****For your purposes*****
- You may email and text a consumer if they email or text you about the debt you are collecting or they verbally consent over the phone
- **RECOMMENDATION:** With every email or text response, confirm that you have consent to continue to email or text in the future.
- **RECOMMENDATION:** Refresh the training of any consumer facing employee to listen for (or if processing mail – read for) any communication preferences or revocations or changes of them.
- **EVERY EMAIL AND TEXT MUST INCLUDE AN OPT-OUT OR UNSUBSCRIBE AND YOU MUST ACT ON THAT REQUEST IMMEDIATELY.**

9



Consumers' Communication Options under Reg F



Paper letters in snail mail



Telephone calls to mobile or land lines, including voicemails.



Electronic mail (email)



Rich content messages or SMS text messages



Live chats



Social media messaging (provided third parties cannot see/view)



IVR/artificial voice and IA/Machine bots

SUGGESTED GUIDANCE AND CONSIDERATIONS

- Consumer not required to use specific words or phrases to put collector on notice of inconvenience
- Collector may ask follow up questions to clarify consumer expression
- If consumer initiates a communication at a time that they previously said was inconvenient, the collector may contact the consumer once to confirm
- Email address and telephone numbers are not associated with “places” for purposes of determining inconvenience places.
- A visit to a debt collector’s website at the time/place restriction does not violate the rule, but inconvenience designation still applies.



SUGGESTED GUIDANCE AND CONSIDERATIONS

- Inconvenience restrictions apply to electronic communications as well as phone calls.
- For electronic communications, convenience is measured at time sent, not when scheduled or received.
- Email address and telephone numbers are not associated with “places” for purposes of determining inconvenience places.

PREFERRED

13

SUGGESTED GUIDANCE AND CONSIDERATIONS

- Collector may ask consumer follow up questions regarding the employer’s prohibition or limitations.
- Prohibition includes using communication channels “associated with the POE” i.e. mail, landline phone, etc.
- If collector knows consumer works from 9am – 5pm then calling cell number during that time when collector knows consumer’s employer does not allow personal calls would violate the rule.
- May not rely on consent give to creditor, but charged with creditor’s knowledge if consumer prohibits communication at work.



14

SUGGESTED GUIDANCE AND CONSIDERATIONS

- Oral request to “stop calling” is interpreted to be a preference that the consumer does not want telephone calls but it does not prohibit other forms of communication unless the consumer so states in writing.
- However, email or text satisfies the writing requirement for a C&D for that debt. (BUT BEWARE, OF OPT – OUT.



15

SUGGESTED GUIDANCE AND CONSIDERATIONS

- **No “processing time” grace period dictated by rule.**
- Important for creditor/debt collector to coordinate on any updates a consumer may provide on communication preferences.
- **Opt-out applies to all debts being collected by the collector, so broader than a C&D.**
- Opt-out is specific to the particular email address/phone number.
- Opt-out is not a general cease communication or blanket electronic communication Opt-out (unless specific language otherwise) for other numbers or emails.
- Opt-out is not an Opt-out for phone calls to that telephone number (because phone calls are not electronic communications)
- Can respond one-time in reply to opt-out as long as no debt information.



16



• § 1006.14 - Communication in Connection with Debt Collection

17

§1006.14(b)(2) & (3) – Frequency Limits

Debt collector violates § 1692d(5) by placing a telephone call to a particular person in connection with the collection of a particular debt either:

- More than 7 times within 7 consecutive days; or
- Within a period of 7 consecutive days after having had a telephone conversation with the person in connection with the collection of such debt.

Exclusions:

- Consumer directly consents and collector calls within 7 days of the consent;
- Wrong number or call did not connect (but watch voice mail drop and ringless voicemail); and
- Persons that consumer gave consent to speak with.
- Rebuttable Presumptions
- All communications come into play

§1006.14(h) – More on Frequency Limits

- A debt collector must not communicate or attempt to communicate with a person through a medium of communication if the person has requested that the debt collector not use that medium.
- Exceptions:
 - If person opts-out, you can send one response confirming opt-out but no information about the debt.
 - If person initiates a communication through a medium that person had requested debt collector not use, can respond one time to that person using the same medium.
 - If otherwise required by law... (we do not see instances in debt collection where this consumer preference would be overridden)



19

- § 1006.34 - Model Validation Notice



20

Current Validation Notice Requirements under Section §1692g of the FDCPA

- Today, the FDCPA requires debt collectors to initiate debt collection by sending a “g” notice to consumers – or to subsequently send the notice within five (5) days after that initial communication.
- The “g” notice, which historically has parroted the language of the FDCPA, includes at a minimum this information:
 - The purpose of the communication (i.e., the Mini Miranda)
 - The name of the creditor to whom the debt is owed,
 - A consumer’s right to dispute and request verification of the debt and other information about the debt, and
 - The **amount of the debt**.

21

§1006.34 of Regulation F: Notice for Validation of Debts

- §1006.34(a) – sets forth general requirements of the validation notice;
- §1006.34(b) – sets forth definitions for purposes of the §1006.34(a);
- §1006.34(c) – sets forth the validation information that must be included;
- §1006.34(d) – sets forth the general requirement that the validation information be clear and conspicuous, provides a safe harbor for the use of the Model Form B-1, specified variation of the model notices or substantially similar form and optional disclosures

22

Requirement Regarding Amount of the Debt

- The Bureau interprets the phrase “amount of the debt” to mean that debt collectors must disclose the amount of the debt as of a particular “itemization date.”
- The Bureau believes these dates relate to notable events in the past account history on which a consumer may typically have received information from the creditor
- The Bureau defines itemization date as one of five reference dates for which a debt collector can ascertain the amount of the debt.
- The reference or “itemization dates” are as follows:
 - The last statement date,
 - The charge-off date,
 - The last payment date,
 - The transaction date, and
 - The judgment date (if applicable).

23

Itemization Date Options



Last statement date (date of last statement or invoice provided to a consumer by a creditor)



Charge off date (the date a creditor per its accounting practices “charged off” a debt)



Last payment date (the last date a payment was applied to an account)



Transaction Date (the transaction date is the date that a creditor provided, or made available, a good or service to a consumer)



Date of court judgment (the date of a final court judgment)



Importantly, in addition to providing a balance due as of the itemization date, we are now required to provide an itemization that reflects interest, fees, payments and credits, as applicable, since the itemization date so that it reconciles to the current amount due.

24

Validation Period and Itemization of the Debt:

- End date is 30 days plus 5 business days. Suggestion is to apply same for written and electronic communications.
- Calculated from date sent regardless if debt collector learns notice was received on a different date.
- Important accountability opportunities: if an outside service is used to send letters or electronic letters – (a) date letters are actually sent (recognizing any service standards and turnaround times an outside letter vendor may have); and (b) assure return mail communications are effective and processed timely
- Itemization can be on a separate page if referenced effectively on face of letter




25

“Safe Harbor” Guidance

- Use of the model form will only provide a safe harbor for requirements of §1006.34(c) (validation information) and §1006.34(d)(1)(clear and conspicuous).
- There is no mandate to use the model form, but any alternative form must be substantially similar to the model form (if you wish to avail yourself of the “safe harbor”).
- *If you deviate “substantially from the model notice you will need to assure the validation notice meets the Reg F standards in Section 1006.34.*
- Use of the model form does not protect a debt collector from claims of false and misleading representations or unfair practices found in §1692e or §1692f of the FDCPA.
- Use of the model form “as is” does not provide a safe harbor under state laws
- CAUTION! If a debt collector uses a different form, they should expect challenges to the term “substantially similar”.
- Optional disclosures provide flexibility and greater opportunities for electronic communications.
- Clear and conspicuous is defined, stay consistent with font size; always opt for bigger over smaller

26



North South Group
P.O. Box 123456
Pasadena, CA 91111-2222
(800) 123-4567 from Sun to Sat, Monday to Saturday
www.example.com

To: Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815
Reference: 584-345

North South Group is a debt collector. We are trying to collect a debt that you owe to Bank of Rockville. We will use any information you give us to help collect the debt.

Our information shows:
You had a Main Street Department Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2017, you owed:	\$ 2,234.56
Between January 2, 2017 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid or were credited this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 2,284.56

How can you dispute the debt?

- Call or write to us by August 28, 2020, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by August 28, 2020, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.example.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by August 28, 2020, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at www.example.com/request.
- Go to www.cfpb.gov/debt-collection to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.
- Píngase en contacto con nosotros para solicitar una copia de este formulario en español.

Notice: See reverse side for important information.

Mail this form to:
North South Group
P.O. Box 123456
Pasadena, CA 91111-2222


Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815

How do you want to respond?
Check all that apply:
 I want to dispute the debt because I think:
 This is not my debt.
 The amount is wrong.
 Other (please describe on reverse or attach additional information).
 I want you to send me the name and address of the original creditor.
 I enclosed this amount: \$

Make your check payable to North South Group. Include the reference number 584-345.
 Quiero este formulario en español.

Validation End Date
1006.34(b)(5)

Itemization Date
1006.34(b)(3)



North South Group
P.O. Box 123456
Pasadena, CA 91111-2222
(800) 123-4567 from Sun to Sat, Monday to Saturday
www.example.com

To: Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815
Reference: 584-345

North South Group is a debt collector. We are trying to collect a debt that you owe to Bank of Rockville. We will use any information you give us to help collect the debt.

Our information shows:
You had a Main Street Department Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2017, you owed:	\$ 2,234.56
Between January 2, 2017 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid or were credited this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 2,284.56

How can you dispute the debt?

- Call or write to us by August 28, 2020, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by August 28, 2020, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.example.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by August 28, 2020, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at www.example.com/request.
- Go to www.cfpb.gov/debt-collection to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.
- Píngase en contacto con nosotros para solicitar una copia de este formulario en español.

Notice: See reverse side for important information.


Mail this form to:
North South Group
P.O. Box 123456
Pasadena, CA 91111-2222

Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815

How do you want to respond?
Check all that apply:
 I want to dispute the debt because I think:
 This is not my debt.
 The amount is wrong.
 Other (please describe on reverse or attach additional information).
 I want you to send me the name and address of the original creditor.
 I enclosed this amount: \$

Make your check payable to North South Group. Include the reference number 584-345.
 Quiero este formulario en español.

Debt Collector Disclosure
1006.34(c)(1)



North South Group
P.O. Box 123456
Pasadena, CA 91111-2222
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday
www.example.com

To: Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815
Reference: 584-345

North South Group is a debt collector. We are trying to collect a debt that you owe to Bank of Rockville. We will use any information you give us to help collect the debt.

Our information shows:

You had a Main Street Department Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2017, you owed	\$ 2,234.56
Between January 2, 2017 and today:	
You were charged this amount in interest	+ \$ 75.00
You were charged this amount in fees	+ \$ 25.00
You paid or were credited this amount toward the debt	- \$ 50.00
Total amount of the debt now:	\$ 2,284.56

How can you dispute the debt?

- Call or write to us by August 28, 2020, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by August 28, 2020, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.example.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by August 28, 2020, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at www.example.com/request.
- Go to www.ftb.gov/ftbdebt-collection to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.
- Píngase en contacto con nosotros para solicitar una copia de este formulario en español.

Information about the Debt 1006.34(c)(2)

Notice: See reverse side for important information.

Mail this form to:
North South Group
P.O. Box 123456
Pasadena, CA 91111-2222

How do you want to respond?

Check all that apply:

I want to dispute the debt because I think:

- This is not my debt.
- The amount is wrong.
- Other (please describe on reverse or attach additional information).



I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ _____

Make your check payable to North South Group. Include the reference number 584-345.

Quiero este formulario en español.

Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815

North South Group
P.O. Box 123456
Pasadena, CA 91111-2222
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday
www.example.com

To: Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815
Reference: 584-345

North South Group is a debt collector. We are trying to collect a debt that you owe to Bank of Rockville. We will use any information you give us to help collect the debt.

Our information shows:

You had a Main Street Department Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2017, you owed	\$ 2,234.56
Between January 2, 2017 and today:	
You were charged this amount in interest	+ \$ 75.00
You were charged this amount in fees	+ \$ 25.00
You paid or were credited this amount toward the debt	- \$ 50.00
Total amount of the debt now:	\$ 2,284.56

How can you dispute the debt?

- Call or write to us by August 28, 2020, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by August 28, 2020, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.example.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by August 28, 2020, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at www.example.com/request.
- Go to www.ftb.gov/ftbdebt-collection to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.
- Píngase en contacto con nosotros para solicitar una copia de este formulario en español.

Information about Consumer Protections 1006.34(c)(3)

Notice: See reverse side for important information.

Mail this form to:
North South Group
P.O. Box 123456
Pasadena, CA 91111-2222

How do you want to respond?

Check all that apply:

I want to dispute the debt because I think:

- This is not my debt.
- The amount is wrong.
- Other (please describe on reverse or attach additional information).


I want you to send me the name and address of the original creditor.


I enclosed this amount: \$ _____

Make your check payable to North South Group. Include the reference number 584-345.

Quiero este formulario en español.

Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815





North South Group
P.O. Box 123456
Pasadena, CA 91111-2222
(800) 123-4567 from Mon to Sat 9am EST, Monday to Saturday
www.example.com

To: Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815
Reference: 584-345

North South Group is a debt collector. We are trying to collect a debt that you owe to Bank of Rockville. We will use any information you give us to help collect the debt.

Our information shows:
You had a Main Street Department Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2017, you owed	\$ 2,234.56
Between January 2, 2017 and today:	
- You were charged this amount in interest	+ \$ 75.00
- You were charged this amount in fees	+ \$ 25.00
- You paid or were credited this amount toward the debt	- \$ 50.00
Total amount of the debt now:	\$ 2,284.56

How can you dispute the debt?

- Call or write to us by August 28, 2020, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by August 28, 2020, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.example.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by August 28, 2020, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at www.example.com/request.
- Go to www.cfpb.gov/debt-collection to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

Consumer Response Information 1006.34(c)(4)

Notice: See reverse side for important information.

Mail this form to:
North South Group
P.O. Box 123456
Pasadena, CA 91111-2222

Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815



How do you want to respond?

Check all that apply:

- I want to dispute the debt because I think:
 - This is not my debt.
 - The amount is wrong.
 - Other (please describe on reverse or attach additional information).
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ _____

Make your check payable to North South Group. Include the reference number 584-345.

Quiero este formulario en español.

North South Group
P.O. Box 123456
Pasadena, CA 91111-2222
(800) 123-4567 from Mon to Sat 9am EST, Monday to Saturday
www.example.com

To: Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815
Reference: 584-345

North South Group is a debt collector. We are trying to collect a debt that you owe to Bank of Rockville. We will use any information you give us to help collect the debt.

Our information shows:
You had a Main Street Department Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2017, you owed	\$ 2,234.56
Between January 2, 2017 and today:	
- You were charged this amount in interest	+ \$ 75.00
- You were charged this amount in fees	+ \$ 25.00
- You paid or were credited this amount toward the debt	- \$ 50.00
Total amount of the debt now:	\$ 2,284.56

How can you dispute the debt?

- Call or write to us by August 28, 2020, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by August 28, 2020, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.example.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by August 28, 2020, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at www.example.com/request.
- Go to www.cfpb.gov/debt-collection to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

Optional Disclosures 1006.34(d)(3)(i)-(iii)

Notice: See reverse side for important information.

Mail this form to:
North South Group
P.O. Box 123456
Pasadena, CA 91111-2222

Person A
2323 Park Street
Apartment 342
Bethesda, MD 20815


How do you want to respond?


Check all that apply:

- I want to dispute the debt because I think:
 - This is not my debt.
 - The amount is wrong.
 - Other (please describe on reverse or attach additional information).
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ _____

Make your check payable to North South Group. Include the reference number 584-345.

Quiero este formulario en español.





**Optional Disclosures
1006.34(d)(3)(v)**

North South Group
P.O. Box 123456
Pasadena, CA 91111-2222
(800) 123-4567 from 8am to 5pm EST, Monday to Saturday
www.example.com

To: Person A
2323 Park Street
Apartment 142
Bethesda, MD 20815
Reference: 584-345

North South Group is a debt collector. We are trying to collect a debt that you owe to Bank of Rockville. We will use any information you give us to help collect the debt.

Our information shows:

You had a Main Street Department Store credit card from Bank of Rockville with account number 123-456-789	
As of January 2, 2017, you owed	\$ 2,234.56
Between January 2, 2017 and today	
You were charged this amount in interest	+ \$ 75.00
You were charged this amount in fees	+ \$ 28.00
You paid or were credited this amount toward the debt	- \$ 50.00
Total amount of the debt now:	\$ 2,287.56

How can you dispute the debt?

- Call or write to us by August 28, 2020, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by August 28, 2020, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.example.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by August 28, 2020, we must stop collection until we send you this information. **You may use the form below or write to us without the form. We accept such requests electronically at www.example.com/dispute.**
- Go to [www.ftcr.gov/1006-34\(d\)\(3\)\(v\)-collection](http://www.ftcr.gov/1006-34(d)(3)(v)-collection) to learn more about your rights under federal law. For instance, you have the right to dispute and how we collect you.
- Contact us about your payment options.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

How do you want to respond?

Check all that apply:

- I want to dispute the debt because I think:
 - This is not my debt.
 - The amount is wrong.
 - Other (please describe on reverse or attach additional information).
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$


Make your check payable to North South Group. Include the reference number 584-345.

Quiero este formulario en español.

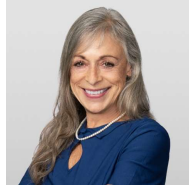
Website & email information and explanation of how to dispute electronically →

Spanish language translation disclosure →

Contacts



George Buck
Consultant, ARM Industry
gebuck820@gmail.com



Leslie C. Bender
Senior Counsel
Privacy, Data Security,
and Consumer
Financial Protection
lbender@clarkhill.com



Legal Disclaimer

This document is not intended to give legal advice. It is comprised of general information. Companies facing specific issues should seek the assistance of an attorney.

