Monthly Complaint Report

Vol. 18



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1. Complaint volume

The Consumer Financial Protection Bureau (CFPB) is the first federal agency solely focused on consumer financial protection,¹ and consumer complaints² are an integral part of that work. The CFPB's Office of Consumer Response hears directly from consumers about the challenges they face in the marketplace, brings their concerns to the attention of companies, and assists in addressing their complaints. This Monthly Complaint Report provides a high-level snapshot of trends in consumer complaints.

The Monthly Complaint Report uses a three-month rolling average, comparing the current average to the same period in the prior year where appropriate, to account for monthly and seasonal fluctuations. In some cases, we use month-to-month comparisons to highlight more immediate trends. For company-level complaint data, we use a three-month rolling average of complaints sent to companies for response. This company-level complaint data lags other complaint data in this report by two months to reflect the 60 days companies have to respond to complaints, confirming a commercial relationship with the consumer. This is consistent with complaints found in the public Consumer Complaint Database.³

¹ The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, Pub. L. No. 111-203 ("Dodd-Frank Act") created the CFPB to protect consumers of financial products or services and to encourage the fair and competitive operation of consumer financial markets.

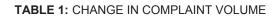
² Consumer complaints are submissions that express dissatisfaction with, or communicate suspicion of wrongful conduct by, an identifiable entity related to a consumer's personal experience with a financial product or service.

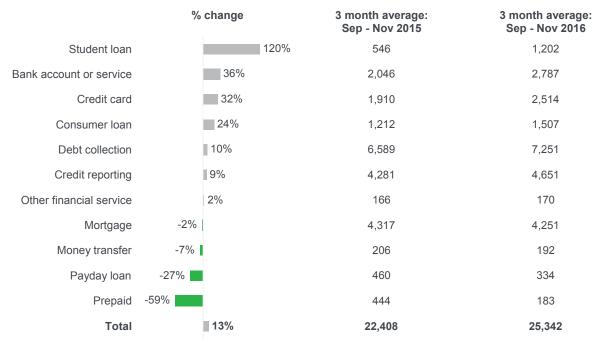
³ This report is based on dynamic data and may slightly differ from other public reports. Company-level information should be considered in context of company size and/or market share. Complaints referred to other regulators, such as complaints about depository institutions with less than \$10 billion in assets, are not published in the Consumer Complaint Database.

Visit <u>consumerfinance.gov/complaint</u> to learn about how we handle complaints or to submit a complaint. Visit our Consumer Complaint Database at <u>consumerfinance.gov/complaintdatabase</u> to search, sort, filter, and export complaints.

1.1 Complaint volume by product

As of December 1, 2016, the CFPB has handled approximately 1,058,100 complaints, including approximately 23,100 complaints in November 2016. Table 1 shows the percentage change in complaint volume by product, comparing September - November 2015 with September - November 2016.⁴





⁴ Complaint totals include all complaints with product breakdowns focusing on the most-complained-about consumer financial products and services.

- Student loan complaints showed the greatest percentage increase from September -November 2015 (546 complaints) to September - November 2016 (1,202 complaints), representing about a 120 percent increase. Part of this year-to-year increase can be attributed to the CFPB updating its student loan intake form to accept complaints about Federal student loan servicing in February 2016.
- Prepaid complaints showed the greatest percentage decrease from September -November 2015 (444 complaints) to September - November 2016 (183 complaints), representing about a 59 percent decline.

Table 2 shows the complaint volume this month by product. The graphic at the end of each row under the heading "Monthly complaints" shows the volume trend from when the CFPB began accepting complaints about that product (green dot) to the current month (blue dot). The monthly average reflects complaints handled per month since we began accepting those complaints.⁵

⁵ The CFPB has used a phased-in approach to expand its complaint handling over time to include multiple products and services under its authority. Complaint-handling capacity was expanded as follows: credit card complaints on July 21, 2011, mortgage complaints on December 1, 2011, bank accounts and services, private student loans, and consumer loans on March 1, 2012, credit reporting on October 22, 2012, money transfers on April 4, 2013, debt collection on July 10, 2013, payday loans on November 6, 2013, prepaid cards, credit repair, debt settlement, and pawn and title loans on July 19, 2014, and virtual currency on August 11, 2014. See Table 2. On February 25, 2016, the CFPB updated its student loan intake form to accept complaints about Federal student loan servicing.

| | | | Monthly | | | | |
|-------------------------|--------------------------|---------------------------|---------|------------------|--|--|--|
| Products | Complaints this month | % change vs last month | average | Total complaints | Monthly complaints | | |
| Debt collection | 6,730 | -13% | 6,890 | 285,754 | | | |
| Credit reporting | 4,138 | -21% | 3,545 | 177,469 | | | |
| Mortgage | 3,954 | -9% | 4,205 | 256,737 | Manun | | |
| Bank account or service | 2,440 | -14% | 1,796 | 105,195 | - Munner ward | | |
| Credit card | 2,213 | -16% | 1,674 | 109,328 | Mun | | |
| Consumer loan | 1,384 | -14% | 810 | 47,058 | and the second and the second se | | |
| Student loan | 1,044 | -16% | 582 | 33,713 | Munum | | |
| Payday loan | 335 | -0.6% | 429 | 16,348 | | | |
| Prepaid | 183 | 2% | 212 | 6,399 | | | |
| Money transfer | 180 | -5% | 166 | 7,465 | | | |
| Other financial service | 160 | -10% | 155 | 4,685 | ~~~~~ | | |
| Total | 23,134 | -14% | 16,278 | 1,058,082 | when when the | | |
| | | | | | 2013 2016 | | |
| | | | | Product la | unch month 📃 This month | | |
| | | | | | | | |

TABLE 2: MONTHLY PRODUCT TRENDS⁶

⁶ Gray bars show +/- 1 standard deviation for monthly complaints since we began accepting those complaints. Total complaints column includes 7,931 complaints where no specific consumer financial product was selected by consumers.

- Debt collection complaints represented about 29 percent of complaints submitted in November 2016.
- Prepaid complaints showed the greatest month-over-month percentage increase (2 percent).
- Credit reporting complaints showed the greatest month-over-month percentage decrease (-21 percent).
- Debt collection, credit reporting and mortgages continue to be the top three mostcomplained-about consumer financial products and services, collectively representing about 64 percent of complaints submitted in November 2016.

1.2 Complaint volume by state

TABLE 3: CHANGE IN COMPLAINT VOLUME BY STATE

| IA 39% 94 130 5,018 161 GA 37% 962 1,319 45,041 441 AK 35% 27 36 1,383 187 LA 33% 242 321 11,714 251 MT 30% 37 49 1,881 182 MO 29% 296 382 14,522 239 TX 29% 1,762 2,268 84,310 307 CT 25% 223 280 11,636 324 CO 24% 344 428 17,708 325 IL 21% 110 132 5,767 198 NY 20% 309 372 13,246 458 |
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| |
| MN 6% 251 267 11,963 218 |
| VA 6% 708 752 32,927 393 |
| MD 6% 677 719 31,898 531 |
| AR 5% 113 119 4,920 165 |
| MS 1% 143 145 5,635 188 |
| OH 1% 704 712 32,306 278 |
| WA 0.9% 505 510 21,456 299 |
| KY -1% 191 189 8,433 191 |
| MI -3% I 557 541 26,789 270 |
| WV -4% I 74 71 3,002 163 |
| SC -4% I 347 333 14,061 287 |
| NE -5% 86 82 3,612 190 |
| HI -5% 1 78 74 3,749 262 |
| WI -6% 2 61 247 12,180 211 |
| ME -9% 1 71 64 3,460 260 |
| DE -10% 121 108 5,380 569 |
| ND -13% 2 6 22 1,041 138 |
| WY -15% 2 7 23 1,137 194 |
| ID -17% 9 5 79 3,912 236 |
| RI -20% — 73 58 3,319 314 |
| VT -23% 4 0 31 1,691 270 |

- Iowa (39 percent), Georgia (37 percent), and Alaska (35 percent) experienced the greatest complaint volume percentage increase from September - November 2015 to September - November 2016.
- Vermont (-23 percent), Rhode Island (-20 percent), and Idaho (-17 percent) experienced the greatest complaint volume percentage decrease from September - November 2015 to September - November 2016.
- Of the five most populated states, Texas (29 percent) experienced the greatest complaint volume percentage increase and California (8 percent) experienced the least complaint volume percentage increase from September November 2015 to September November 2016.⁷

⁷ Complaints per 100k population are defined as cumulative complaints divided by Census estimated 2015 population. Census population data source: <u>http://www.census.gov/popest/data/state/totals/2015/index.html</u>

1.3 Complaint volume by company

Complaint data in this section lags other complaint data by two months to reflect the 60 days companies have to respond to complaints, confirming a commercial relationship with the consumer. Figure 1 and Table 4 show the top 10 most-complained-about companies for July - September 2016. Figure 1 also shows which products consumers complained about for each company. The "Other" category includes consumer loans, student loans, money transfers, payday loans, prepaid cards, and other financial service complaints. Complaints sent to these companies account for 51 percent of all complaints sent to company size and/or market share.

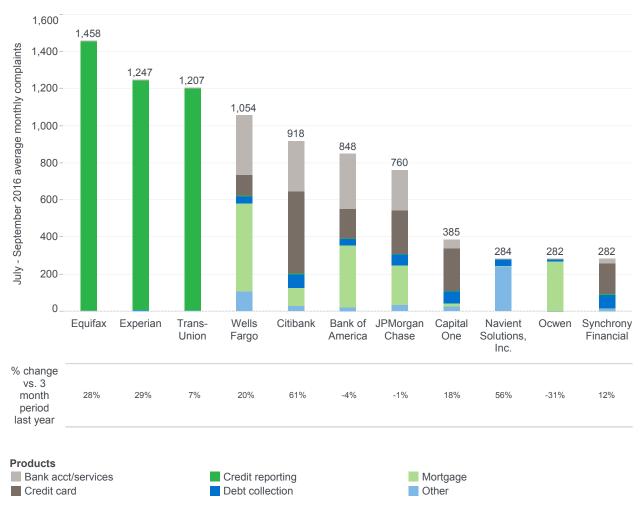


FIGURE 1: TOP 10 MOST-COMPLAINED-ABOUT COMPANIES

| Company | 3 month average: July - September 2016 | % change vs. 3 month period last year | Monthly average ⁹ | Total complaints |
|----------------------------|--|---|---------------------------------|---------------------|
| Equifax | 1,458 | 28% | 825 | 39,598 |
| Experian | 1,247 | 29% | 785 | 37,658 |
| TransUnion | 1,207 | 7% | 661 | 31,733 |
| Wells Fargo | 1,054 | 20% | 813 | 47,154 |
| Citibank | 918 | 61% | 524 | 30,379 |
| Bank of America | 848 | -4% | 1,044 | 60,578 |
| JPMorgan Chase | 760 | -1% | 654 | 37,929 |
| Capital One | 385 | 18% | 304 | 17,608 |
| Navient Solutions, Inc. | 284 | 56% | 181 | 9,931 |
| Ocwen | 282 | -31% | 390 | 22,619 |
| Synchrony Financial | 282 | 12% | 189 | 10,987 |

TABLE 4: TOP 10 MOST-COMPLAINED-ABOUT COMPANIES⁸

- By average monthly complaint volume, Equifax (1,458), Experian (1,247), and TransUnion (1,207) were the most-complained-about companies for July - September 2016.
- Citibank experienced the greatest percentage increase in average monthly complaint volume (61 percent) from July September 2015 to July September 2016.
- Ocwen experienced the greatest percentage decrease in average monthly complaint volume (-31 percent) from July September 2015 to July September 2016.

⁸ On February 25, 2016, the CFPB updated its student loan intake form to accept complaints about Federal student loan servicing.

⁹ Monthly average calculated from the month the CFPB first handled complaints for the company. Total complaints represent cumulative complaints sent to companies through September 2016.

2.Product spotlight: Debt collection

The CFPB has handled approximately 285,800 debt collection complaints since July 21, 2011, making debt collection the most-complained-about product, representing 27 percent of total complaints.

Approximately 129,200 (or 45 percent) of all debt collection complaints handled by the CFPB from July 21, 2011 through November 30, 2016 were sent by the CFPB to companies for review and response. The remaining complaints have been referred to other regulatory agencies (38 percent), found to be incomplete (9 percent), or are pending with the consumer or the CFPB (1 percent and 7 percent, respectively). These complaints include first-party (creditors collecting on their own debts) and third-party collections.

Complaints handled by the Bureau, including those sent to other regulators, serve to inform the Bureau in its work to supervise companies, to enforce consumer financial laws, to write better rules and regulations, and to educate and engage consumers.

2.1 Debt collection complaints by type

Figures 2 and 3 show the types of debt collection complaints consumers submitted as a percentage of all debt collection complaints handled. The most common issues identified by consumers are problems with continued attempts to collect debt not owed (39 percent) and communication tactics (18 percent).

FIGURE 2: TYPES OF DEBT COLLECTION COMPLAINTS REPORTED BY CONSUMERS

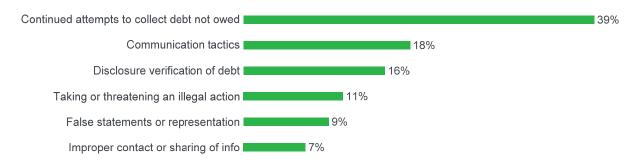
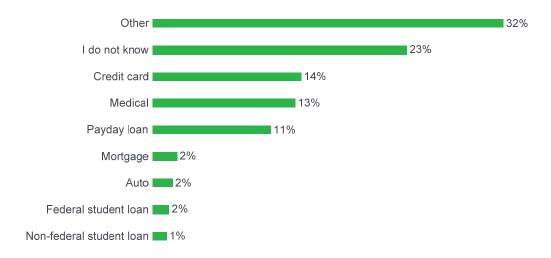


FIGURE 3: TYPES OF DEBT COLLECTION PRODUCTS CONSUMER COMPLAIN ABOUT



- Consumers reported being contacted by collectors for debts that were no longer owed and not being provided documentation to verify the debt, even after some of these consumers submitted requests for verification of the purported debts.
- Consumers complained that first-party collectors (creditors collecting on their own debts) forwarded their accounts to third-party collectors for debt that was not owed. Upon dispute with the third-party collector, some consumers report that the debt is sent back to the first-party, only to be later sent to a new third-party collector. Some consumers report that the onus of disproving that the debt is not owed is placed on them r throughout this cycle.
- A number of consumers complained their accounts were forwarded to third-party collectors without any prior contact from the first-party collectors of an outstanding

balance. Some complained that accounts had been negatively reported to credit reporting companies even after communicating with the first and third-parties. Some consumers also reported that their accounts were not in a delinquent status prior to contact by third-party collectors.

- Where "Medical" was identified as the type of debt, consumers selected issues of debt was paid and debt was not mine for the majority of the complaints.
- Frequently, consumers state that third-party debt collectors attempted to collect medical debt with incorrect balances. Some of these consumers reported they had secured a payment plan with the original party; however, the account was forwarded to collection agencies without regard to prior approved payment plans. Other complaints involved consumers' insistence that the amount due was erroneous as they believed the amount pursued by collectors was for expenses covered by their medical insurance.
- Consumers who submitted complaints about medical debts said that despite having already paid their balances in full, their accounts were turned over to collection agencies. These consumers often reported that they did not receive a verification of debt from the collector.
- Consumers report that frequent or repeated calls are a commonly used collection tactic. Consumers describe collection calls to their place of employment even after having informed collectors that contact at work was prohibited by their employers. Some consumers said they received multiple calls daily or weekly from collectors and expressed feelings of harassment.

2.2 Debt collection complaints by state

Table 5 shows the debt collection complaint volume percentage change by state.¹⁰ Some of the highlights include:

- Iowa (66 percent), Georgia (52 percent), and Arkansas (48 percent) experienced the greatest percentage increase in debt collection complaints from September - November 2015 to September - November 2016.
- Delaware (-34 percent), Rhode Island (-34 percent), and Idaho (-29 percent) experienced the greatest percentage decrease in debt collection complaints from September - November 2015 to September - November 2016.
- Of the five most populated states, Texas (34 percent) experienced the greatest percentage increase and California (0.3 percent) experienced the least percentage increase in debt collection complaints from September November 2015 to September November 2016.

¹⁰ Three-month averages are rounded, and percentage changes are based on non-rounded averages.

TABLE 5: DEBT COLLECTION COMPLAINT VOLUME PERCENT CHANGE BY STATE

| | % change | 3 month average: Sep - Nov 2015 | 3 month average: Sep - Nov 2016 | Total complaints | Complaints per 100k population |
|----|------------|------------------------------------|------------------------------------|------------------|--------------------------------|
| IA | 66% | 29.3 | 48.7 | 1,686 | 54.0 |
| GA | 52% | 251.7 | 383.3 | 11,127 | 108.9 |
| AR | 48% | 27.3 | 40.3 | 1,466 | 49.2 |
| HI | 36% | 19.7 | 26.7 | 969 | 67.7 |
| ТΧ | 34% | 656.0 | 878.7 | 28,299 | 103.0 |
| NC | 29% | 155.0 | 200.0 | 7,339 | 73.1 |
| KY | 28% | 63.3 | 81.0 | 2,897 | 65.5 |
| KS | 25% | 40.7 | 51.0 | 2,007 | 68.9 |
| СТ | 23% | 50.3 | 61.7 | 2,599 | 72.4 |
| NY | 21% | 340.0 | 411.0 | 14,615 | 73.8 |
| NM | 17% | 39.7 | 46.3 | 1,764 | 84.6 |
| MA | 16% | 75.0 | 87.0 | 3,918 | 57.7 |
| TN | 16% | 145.0 | 168.0 | 5,919 | 89.7 |
| FL | 15% | 585.0 | 672.7 | 25,483 | 125.7 |
| OR | 11% | 82.7 | 92.0 | 3,512 | 87.2 |
| VA | ■ 10% | 190.3 | 208.7 | 8,605 | 102.6 |
| WA | 9% | 133.0 | 144.3 | 5,966 | 83.2 |
| NH | ■ 8% | 26.3 | 28.3 | 1,078 | 81.0 |
| NJ | 6% | 198.3 | 209.7 | 8,822 | 98.5 |
| IN | 5% | 93.3 | 97.7 | 3,931 | 59.4 |
| DC | 4% | 27.7 | 28.7 | 1,431 | 212.9 |
| ND | 4% | 9.3 | 9.7 | 385 | 50.9 |
| OH | 4% | 209.0 | 216.3 | 9,616 | 82.8 |
| MO | 3% | 100.3 | 103.7 | 4,513 | 74.2 |
| IL | 1% | 231.7 | 234.3 | 9,745 | 75.8 |
| SC | 1% | 97.0 | 98.0 | 4,368 | 89.2 |
| PA | 0.7% | 247.7 | 249.3 | 9,888 | 77.2 |
| CA | 0.3% | 870.7 | 873.0 | 36,261 | 92.6 |
| WV | 0.0% | 21.0 | 21.0 | 854 | 46.3 |
| WI | -0.4% | 76.3 | 76.0 | 3,683 | 63.8 |
| AZ | -0.7% | 180.7 | 179.3 | 6,690 | 98.0 |
| OK | -1% | 60.7 | 60.0 | 2,831 | 72.4 |
| NV | -1% | 99.3 | 98.0 | 3,783 | 130.9 |
| LA | -2% | 87.7 | 86.3 | 4,024 | 86.2 |
| CO | -2% | 109.7 | 107.0 | 4,840 | 88.7 |
| AL | -4% | 99.7 | 96.0 | 3,849 | 79.2 |
| MD | -4% | 194.3 | 186.7 | 7,495 | 124.8 |
| MI | -5% | 162.3 | 154.3 | 7,084 | 71.4 |
| UT | -6% | 43.3 | 40.7 | 2,029 | 67.7 |
| MT | -10% | 19.7 | 17.7 | 688 | 66.6 |
| SD | -13% | 12.7 | 11.0 | 583 | 67.9 |
| NE | -14% | 36.3 | 31.3 | 1,267 | 66.8 |
| ME | -14% | 19.3 | 16.7 | 853 | 64.2 |
| MS | -14% | 51.7 | 44.3 | 1,878 | 62.8 |
| MN | -16% | 74.3 | 62.3 | 3,017 | 55.0 |
| | -26% | 9.0 | 6.7 | 355 | 56.7 |
| | -27% | 11.0 | 8.0 | 394 | 67.2 |
| | -29% | 11.7 | 8.3 | 453 | 61.3 |
| | -29% | 39.0 | 27.7 | 1,376 | 83.1 |
| | -34% | 21.7 | 14.3 | 878 | 83.1 |
| | -34% | 44.7 | 29.3 | 1,502 | 158.8 |
| | | | 20.0 | 1,302 | 100.0 |

2.3 Debt collection complaints by company

Each month, this section highlights the most-complained-about companies to which we sent complaints.

Companies are expected to respond to complaints sent to them within 15 days. If a complaint cannot be closed within 15 days, the company may indicate that its work on the complaint is "In progress" and provide a final response within 60 days. Company responses provided outside of those windows are considered untimely.

Companies can alert the Bureau if the company believes a complaint is the result of fraud, including business identity theft or debt collection scams. Complaints that receive appropriate alerts are not published in the Consumer Complaint Database or included in company-specific complaint volume presented in this report. The top 35 most-complained-about companies for debt collection received about 40 percent of all debt collection complaints sent to companies for response in July - September 2016. This section highlights those complaints. Table 6 shows the top 20 of these 35 (see Table 13 in Appendix A for the full list). Top companies in Tables 7-10 are based on the top 35 most-complained-about companies. Company-level information should be considered in context of company size and/or market share.

| Company | 3 month average: Jul - Sep 2016 | % change vs. 3 month period last year | 3 month average % untimely: Jul - Sep 2016 |
|---|------------------------------------|--|---|
| Portfolio Recovery Associates, Inc. | 124.7 | -8% | 0% |
| Encore Capital Group | 123.0 | -34% | 0% |
| ERC | 83.0 | -28% | 0.4% |
| Citibank | 77.3 | 12% | 0% |
| Synchrony Financial | 73.7 | 32% | 0% |
| Capital One | 69.0 | 47% | 0.5% |
| JPMorgan Chase | 65.0 | 31% | 0.5% |
| Transworld Systems Inc. | 62.0 | -12% | 0% |
| Convergent Resources, Inc. | 49.3 | 21% | 0% |
| Diversified Consultants, Inc. | 48.7 | 30% | 0.7% |
| Wells Fargo | 42.3 | 76% | 16% |
| I.C. System, Inc. | 40.3 | 32% | 0% |
| Bank of America | 39.7 | 27% | 0% |
| Navient Solutions, Inc. | 39.0 | 19% | 0% |
| Afni, Inc. | 38.3 | -8% | 0% |
| Tenet HealthCare Corporation | 37.7 | 122% | 20% |
| Resurgent Capital Services L.P. | 33.0 | -3% | 1% |
| Southwest Credit Systems, L.P. | 32.0 | 146% | 88% |
| National Credit Systems,Inc. | 31.0 | 19% | 5% |
| Commonwealth Financial Systems, Inc. | 30.3 | 20% | 2% |

TABLE 6: MOST-COMPLAINED-ABOUT COMPANIES FOR DEBT COLLECTION¹¹

¹¹ Three-month averages are rounded, and percentage changes are based on non-rounded averages.

| Name | % change vs. 3 month period last year | 3 month average: Jul - Sep 2015 | 3 month average: Jul - Sep 2016 |
|--------------------------------|--|------------------------------------|------------------------------------|
| Barclays PLC | 618% | 3.7 | 26.3 |
| Southwest Credit Systems, L.P. | 146% | 13.0 | 32.0 |
| Tenet HealthCare Corporation | 122% | 17.0 | 37.7 |
| Amex | 96% | 8.3 | 16.3 |
| Wells Fargo | 76% | 24.0 | 42.3 |

TABLE 7: COMPANIES WITH THE LARGEST PERCENT INCREASE IN DEBT COLLECTION COMPLAINTS

TABLE 8: COMPANIES WITH THE LARGEST PERCENT DECREASE IN DEBT COLLECTION COMPLAINTS

| Name | % change vs. 3 month period last year | 3 month average: Jul - Sep 2015 | 3 month average: Jul - Sep 2016 |
|-------------------------|--|------------------------------------|------------------------------------|
| EOS Holdings, Inc. | -40% | 27.3 | 16.3 |
| Encore Capital Group | -34% | 186.7 | 123.0 |
| The CBE Group, Inc. | -34% | 24.7 | 16.3 |
| ERC | -28% | 116.0 | 83.0 |
| Transworld Systems Inc. | -12% | 70.3 | 62.0 |

- Of these companies, Barclays PLC saw the greatest percentage increase in debt collection complaints (618 percent) from July September 2015 to July September 2016.
- Of these companies, EOS Holdings, Inc. saw the greatest percentage decrease in debt collection complaints (-40 percent) during the same period.

TABLE 9: COMPANIES WITH HIGHEST RATE OF UNTIMELY RESPONSES TO DEBT COLLECTION COMPLAINTS

| Name | 3 month % untimely: Jul - Sep 2016 | Debt collection complaints sent to company: Jul - Sep 2016 |
|---|--|--|
| Southwest Credit Systems, L.P. | 88% | 96 |
| Tenet HealthCare Corporation | 20% | 113 |
| Wells Fargo | 16% | 127 |
| National Credit Systems, Inc. | 5% | 93 |
| Commonwealth Financial Systems, Inc. | 2% | 91 |

TABLE 10: COMPANIES WITH LOWEST RATE OF UNTIMELY RESPONSES TO DEBT COLLECTIONCOMPLAINTS SORTED BY THE MOST TIMELY RESPONSES

| Name | 3 month % untimely: Jul - Sep 2016 | Debt collection complaints sent to company: Jul - Sep 2016 |
|--|--|--|
| Portfolio Recovery Associates, Inc. | 0% | 374 |
| Encore Capital Group | 0% | 369 |
| Citibank | 0% | 232 |
| Synchrony Financial | 0% | 221 |
| Transworld Systems Inc. | 0% | 186 |

- Southwest Credit Systems, L.P. had the greatest rate of untimely responses (88 percent) during the three month period of July September 2016.
- Among companies which had the lowest untimely rate (o percent), Portfolio Recovery Associates, Inc. had the most timely responses at 374 timely responses.

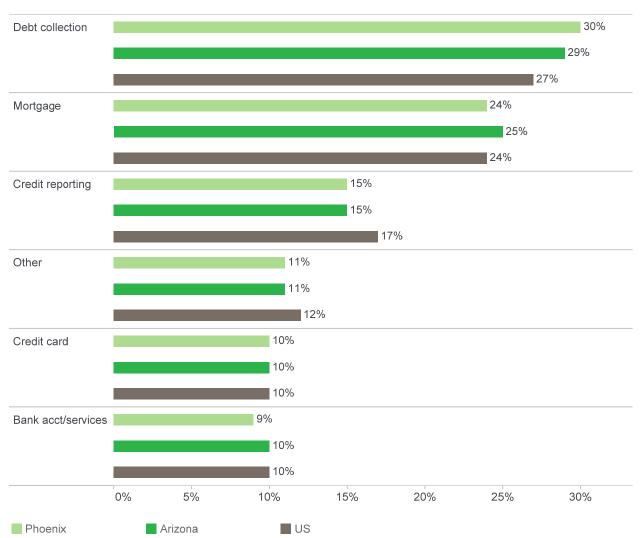
3.Geographic spotlight: Arizona

Each month we spotlight the complaints from one part of the country. This month we are highlighting complaint trends in Arizona and the Phoenix metro area. As of December 1, 2016, about 23,300 complaints were from Arizona consumers, of which, about 15,000 (64 percent) were from Phoenix.¹²

¹² The Phoenix metro area is defined as zip codes from the Phoenix-Mesa-Scottsdale, AZ Core-Based Statistical Areas (CBSA). <u>http://www.census.gov/population/metro/files/zip07_cbsa06.zip</u>. Complaint counts are based on consumer-provided ZIP code and unless otherwise noted the geographic spotlight section reflects cumulative complaint data since July 21, 2011.

3.1 Arizona complaints by product

Figure 4 shows the distribution of complaints by product for Phoenix, Arizona, and the United States as a whole.





- Consumers in Phoenix and Arizona submitted debt collection complaints at a rate of 30 percent and 29 percent, respectively, higher than the 27 percent national average.
- Consumers in Phoenix and Arizona complained about mortgage at a rate of 24 percent and 25 percent, respectively, similar to the 24 percent national average.

3.2 Arizona complaints over time

Average monthly complaints increased 14 percent from September through November 2015 (517 complaints per month) to September through November 2016 (588 complaints per month), similar to the national rate of 13 percent.

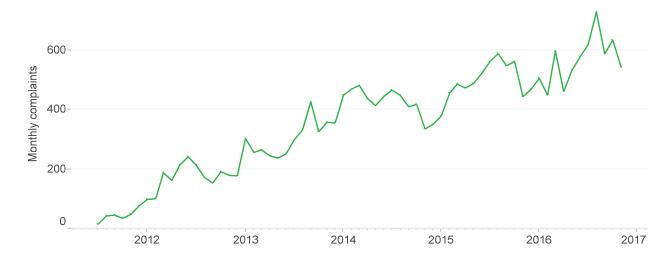


FIGURE 5: ARIZONA MONTHLY COMPLAINT VOLUME TREND

3.3 Arizona complaints by company

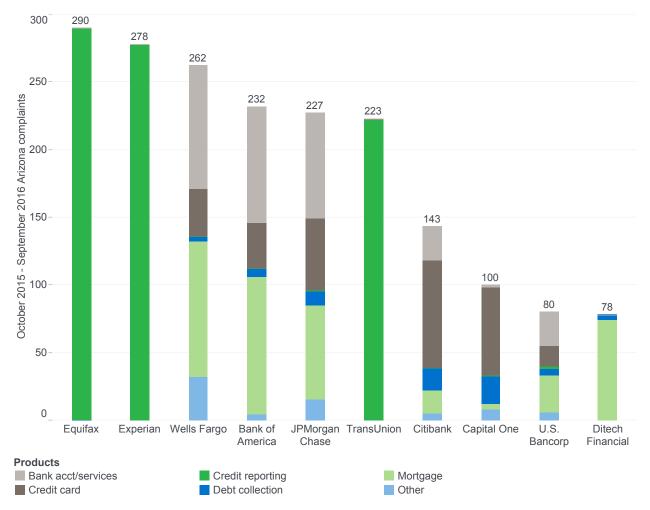


FIGURE 6: MOST-COMPLAINED-ABOUT COMPANIES BY ARIZONA CONSUMERS

Company-level information should be considered in context of company size and/or market share in a given geographic area.

• In the October 2015 - September 2016 period, Equifax, Experian, and Wells Fargo led the list of most-complained-about companies by Arizona consumers.

APPENDIX A:

TABLE 11: TOTAL COMPLAINTS BY MONTH AND PRODUCT

| | Bank account or services | Consumer Ioan | Credit card | Credit reporting | Debt collection | Money transfer | Mortgage | Other financial services | Payday Ioan | Prepaid | Student Ioans | Total |
|--------|--------------------------------|------------------|-------------|---------------------|--------------------|-------------------|----------|--------------------------------|----------------|---------|------------------|--------|
| 11-Jul | 13 | 3 | 517 | 2 | 4 | 0 | 14 | 4 | 0 | 2 | 2 | 564 |
| 11-Aug | 140 | 27 | 1,817 | 12 | 6 | 1 | 127 | 9 | 0 | 5 | 5 | 2,166 |
| 11-Sep | 191 | 45 | 1,718 | 18 | 17 | 2 | 179 | 28 | 4 | 7 | 3 | 2,233 |
| 11-Oct | 159 | 26 | 1,748 | 11 | 8 | 3 | 178 | 24 | 0 | 7 | 4 | 2,188 |
| 11-Nov | 199 | 39 | 1,752 | 5 | 9 | 1 | 275 | 17 | 1 | 0 | 5 | 2,324 |
| 11-Dec | 206 | 29 | 1,604 | 8 | 6 | 2 | 1,696 | 0 | 0 | 14 | 4 | 3,584 |
| 12-Jan | 191 | 30 | 1,453 | 4 | 5 | 0 | 2,526 | 1 | 3 | 6 | 11 | 4,253 |
| 12-Feb | 216 | 37 | 1,433 | 10 | 12 | 2 | 2,694 | 0 | 0 | 6 | 8 | 4,437 |
| 12-Mar | 1,463 | 220 | 1,615 | 12 | 31 | 7 | 3,441 | 6 | 7 | 17 | 666 | 7,526 |
| 12-Apr | 1,504 | 250 | 1,352 | 13 | 31 | 3 | 3,395 | 2 | 8 | 13 | 315 | 6,902 |
| 12-May | 1,963 | 366 | 1,661 | 19 | 36 | 5 | 4,685 | 3 | 8 | 12 | 242 | 9,069 |
| 12-Jun | 1,692 | 340 | 1,976 | 12 | 34 | 2 | 4,642 | 7 | 6 | 10 | 757 | 9,533 |
| 12-Jul | 1,619 | 329 | 1,794 | 32 | 33 | 3 | 4,171 | 6 | 4 | 5 | 315 | 8,353 |
| 12-Aug | 1,596 | 359 | 1,586 | 33 | 24 | 0 | 4,610 | 8 | 3 | 6 | 298 | 8,556 |
| 12-Sep | 1,367 | 304 | 1,256 | 21 | 17 | 0 | 3,653 | 11 | 4 | 12 | 260 | 6,927 |
| 12-Oct | 1,567 | 388 | 1,699 | 551 | 18 | 2 | 4,013 | 6 | 6 | 7 | 398 | 8,686 |
| 12-Nov | 1,252 | 328 | 1,401 | 1,252 | 24 | 1 | 3,525 | 4 | 1 | 4 | 332 | 8,156 |
| 12-Dec | 1,248 | 343 | 1,312 | 1,370 | 62 | 1 | 3,737 | 4 | 15 | 8 | 272 | 8,420 |
| 13-Jan | 1,651 | 391 | 1,454 | 1,561 | 94 | 3 | 7,225 | 6 | 8 | 4 | 384 | 12,877 |
| 13-Feb | 1,459 | 352 | 1,442 | 1,710 | 113 | 11 | 5,681 | 11 | 16 | 9 | 331 | 11,230 |
| 13-Mar | 1,685 | 439 | 1,607 | 1,728 | 153 | 6 | 5,633 | 3 | 15 | 18 | 373 | 11,815 |
| 13-Apr | 1,422 | 457 | 1,508 | 1,903 | 179 | 79 | 5,623 | 3 | 16 | 16 | 371 | 11,704 |
| 13-May | 1,415 | 442 | 1,364 | 1,875 | 111 | 58 | 5,250 | 2 | 26 | 16 | 302 | 10,956 |
| 13-Jun | 1,490 | 426 | 1,312 | 2,042 | 108 | 93 | 5,246 | 4 | 22 | 5 | 287 | 11,089 |
| 13-Jul | 1,657 | 446 | 1,278 | 2,236 | 2,433 | 100 | 5,237 | 2 | 17 | 11 | 341 | 13,786 |
| 13-Aug | 1,683 | 520 | 1,352 | 2,273 | 4,224 | 91 | 4,963 | 2 | 40 | 8 | 350 | 15,540 |
| 13-Sep | 1,666 | 608 | 1,357 | 2,326 | 6,298 | 121 | 4,341 | 3 | 36 | 5 | 371 | 17,166 |
| 13-Oct | 1,800 | 540 | 1,369 | 2,267 | 4,865 | 155 | 3,864 | 4 | 35 | 5 | 422 | 15,372 |
| 13-Nov | 1,565 | 472 | 1,246 | 2,340 | 6,653 | 168 | 3,475 | 1 | 396 | 3 | 344 | 16,708 |
| 13-Dec | 1,535 | 508 | 1,322 | 1,943 | 5,972 | 137 | 3,386 | 3 | 385 | 4 | 409 | 15,633 |
| 14-Jan | 1,829 | 580 | 1,549 | 3,221 | 8,137 | 162 | 4,240 | 0 | 441 | 8 | 491 | 20,694 |
| 14-Feb | 1,808 | 581 | 1,615 | 3,509 | 7,795 | 144 | 4,545 | 2 | 374 | 3 | 494 | 20,889 |
| 14-Mar | 2,047 | 663 | 1,668 | 3,556 | 8,422 | 171 | 4,898 | 3 | 413 | 6 | 584 | 22,459 |
| 14-Apr | 1,987 | 688 | 1,665 | 3,850 | 8,313 | 171 | 4,757 | 8 | 402 | 1 | 541 | 22,411 |

| | Bank account or services | Consumer Ioan | Credit card | Credit reporting | Debt collection | Money transfer | Mortgage | Other financial services | Payday Ioan | Prepaid | Student Ioans | Total |
|---------------------|--------------------------------|------------------|-------------|---------------------|--------------------|-------------------|----------|--------------------------------|----------------|---------|------------------|-----------|
| 14-May | 1,950 | 591 | 1,497 | 3,394 | 7,374 | 175 | 4,099 | 2 | 324 | 5 | 537 | 19,983 |
| 14-Jun | 1,943 | 696 | 1,497 | 3,463 | 7,753 | 184 | 4,134 | 4 | 347 | 5 | 584 | 20,626 |
| 14-Jul | 2,026 | 872 | 1,571 | 3,816 | 7,992 | 157 | 4,411 | 62 | 587 | 94 | 582 | 22,275 |
| 14-Aug | 1,564 | 1,002 | 1,689 | 4,647 | 7,222 | 148 | 4,340 | 104 | 645 | 138 | 626 | 22,319 |
| 14-Sep | 1,593 | 979 | 1,548 | 4,379 | 6,381 | 164 | 4,114 | 110 | 587 | 151 | 594 | 20,806 |
| 14-Oct | 1,625 | 1,026 | 1,437 | 3,561 | 6,684 | 132 | 4,474 | 124 | 532 | 139 | 654 | 20,582 |
| 14-Nov | 1,391 | 910 | 1,357 | 3,569 | 6,131 | 123 | 3,506 | 102 | 478 | 129 | 546 | 18,396 |
| 14-Dec | 1,463 | 982 | 1,459 | 3,698 | 6,070 | 160 | 3,587 | 92 | 468 | 144 | 548 | 18,862 |
| 15-Jan | 1,617 | 998 | 1,515 | 4,149 | 6,547 | 144 | 3,513 | 107 | 458 | 165 | 575 | 19,941 |
| 15-Feb | 1,457 | 990 | 1,788 | 4,032 | 6,874 | 141 | 3,601 | 112 | 472 | 183 | 603 | 20,403 |
| 15-Mar | 1,725 | 1,091 | 1,896 | 4,815 | 8,000 | 195 | 4,287 | 158 | 538 | 199 | 719 | 23,796 |
| 15-Apr | 1,748 | 941 | 1,757 | 4,733 | 7,178 | 190 | 4,238 | 146 | 484 | 192 | 686 | 22,487 |
| 15-May | 1,704 | 1,029 | 1,825 | 4,493 | 7,149 | 208 | 4,266 | 156 | 414 | 177 | 645 | 22,266 |
| 15-Jun | 1,968 | 1,095 | 1,890 | 4,297 | 7,469 | 211 | 4,664 | 166 | 460 | 195 | 626 | 23,248 |
| 15-Jul | 1,997 | 1,344 | 1,961 | 6,547 | 8,184 | 235 | 4,463 | 203 | 478 | 187 | 645 | 26,423 |
| 15-Aug | 2,042 | 1,340 | 1,931 | 5,590 | 7,543 | 218 | 4,949 | 196 | 445 | 179 | 656 | 25,295 |
| 15-Sep | 1,907 | 1,253 | 1,947 | 4,679 | 6,666 | 198 | 4,566 | 148 | 450 | 179 | 612 | 22,817 |
| 15-Oct | 2,247 | 1,292 | 1,964 | 4,432 | 6,810 | 229 | 4,435 | 160 | 508 | 892 | 568 | 23,795 |
| 15-Nov | 1,984 | 1,092 | 1,819 | 3,731 | 6,291 | 192 | 3,951 | 191 | 421 | 260 | 457 | 20,612 |
| 15-Dec | 1,975 | 1,041 | 1,883 | 3,419 | 6,342 | 190 | 3,794 | 162 | 382 | 223 | 467 | 20,138 |
| 16-Jan | 2,110 | 1,174 | 2,001 | 3,367 | 6,681 | 222 | 4,192 | 183 | 422 | 227 | 567 | 21,366 |
| 16-Feb | 1,834 | 1,251 | 1,997 | 3,705 | 7,248 | 198 | 4,455 | 171 | 394 | 206 | 618 | 22,333 |
| 16-Mar | 2,036 | 1,349 | 2,052 | 4,861 | 8,030 | 187 | 4,947 | 207 | 436 | 241 | 1,134 | 25,740 |
| 16-Apr | 1,880 | 1,263 | 1,995 | 4,507 | 7,234 | 195 | 4,314 | 189 | 383 | 177 | 1,190 | 23,553 |
| 16-May | 2,192 | 1,286 | 1,983 | 4,807 | 6,845 | 198 | 4,273 | 126 | 395 | 226 | 963 | 23,606 |
| 16-Jun | 2,541 | 1,274 | 1,979 | 4,907 | 6,943 | 197 | 4,291 | 199 | 370 | 221 | 1,001 | 24,189 |
| 16-Jul | 2,379 | 1,310 | 2,147 | 5,207 | 6,471 | 164 | 3,907 | 137 | 335 | 208 | 1,167 | 23,653 |
| 16-Aug | 2,652 | 1,491 | 2,599 | 4,987 | 9,643 | 228 | 4,287 | 260 | 422 | 244 | 1,246 | 28,341 |
| 16-Sep | 3,086 | 1,530 | 2,689 | 4,590 | 7,304 | 208 | 4,467 | 173 | 329 | 187 | 1,322 | 26,131 |
| 16-Oct | 2,834 | 1,606 | 2,640 | 5,224 | 7,718 | 189 | 4,333 | 178 | 337 | 180 | 1,239 | 26,760 |
| 16-Nov | 2,440 | 1,384 | 2,213 | 4,138 | 6,730 | 180 | 3,954 | 160 | 335 | 183 | 1,044 | 23,134 |
| Total ¹³ | 105,195 | 47,058 | 109,328 | 177,469 | 285,754 | 7,465 | 256,737 | 4,685 | 16,348 | 6,399 | 33,713 | 1,058,082 |

¹³ Total column includes approximately 7,931 complaints where no specific consumer financial product was selected by consumers.

| | Bank account or services | Consumer Ioan | Credit card | Credit reporting | Debt collection | Money transfer | Mortgage | Other financial services | Payday Ioan | Prepaid | Student Ioans | Total |
|--------------------------------------|--------------------------------|------------------|-------------|---------------------|--------------------|-------------------|--------------|--------------------------------|----------------|----------|------------------|---------------|
| Alabama | 1,054 | 777 | 896 | 2,184 | 3,849 | 68 | 1,988 | 69 | 337 | 86 | 379 | 11,791 |
| Alaska | 125 | 58 | 172 | 222 | 453 | 12 | 242 | 7 | 33 | 7 | 46 | 1,383 |
| American | | | | | | | | | | - | | ., |
| Samoa | 10 | 0 | 5 | 5 | 14 | 1 | 7 | 0 | 0 | 0 | 2 | 45 |
| Arizona | 2,226 | 1,197 | 2,410 | 3,488 | 6,690 | 138 | 5,843 | 71 | 246 | 134 | 640 | 23,274 |
| Arkansas | 464 | 276 | 466 | 969 | 1,466 | 38 | 894 | 26 | 72 | 29 | 183 | 4,920 |
| California | 13,967 | 5,603 | 14,421 | 22,448 | 36,261 | 1,015 | 43,986 | 561 | 1,732 | 888 | 3,747 | 145,464 |
| Colorado | 1,630 | 745 | 1,982 | 2,897 | 4,840 | 112 | 4,391 | 74 | 228 | 111 | 582 | 17,708 |
| Connecticut | 1,394 | 522 | 1,574 | 1,651 | 2,599 | 81 | 2,968 | 62 | 171 | 91 | 424 | 11,636 |
| Delaware | 642 | 301 | 664 | 746 | 1,502 | 24 | 1,187 | 30 | 98 | 24 | 131 | 5,380 |
| District of Columbia | 837 | 232 | 719 | 889 | 1,431 | 62 | 1,306 | 52 | 119 | 47 | 333 | 6,103 |
| Federated States of Micronesia | 6 | 2 | 12 | 10 | 14 | 1 | 14 | 1 | 1 | 0 | 1 | 62 |
| Florida | 9,313 | 3,859 | 9,480 | 20,552 | 25,483 | 582 | 27,994 | 336 | | 398 | 2,237 | 102,070 |
| | | | | | | | | | 1,147 | | | |
| Georgia Guam | 4,218 14 | 2,369 11 | 3,584 13 | 8,347 29 | 11,127 39 | 258 3 | 12,754 28 | 149 1 | 396 2 | 296 1 | 1,254 8 | 45,041 149 |
| Hawaii | 286 | 139 | 437 | 636 | 969 | 19 | 1,084 | 14 | 41 | 13 | 89 | 3,749 |
| Idaho | 265 | 166 | 409 | 672 | 1,376 | 25 | 756 | 5 | 69 | 13 | 135 | 3,912 |
| Illinois | 4,218 | 1,481 | 3,893 | 6,407 | 9,745 | 23 | 8,687 | 124 | 586 | 274 | 1,296 | 37,191 |
| Indiana | 1,148 | 636 | 1,166 | 1,959 | 3,931 | 81 | 2,328 | 68 | 331 | 78 | 642 | 12,455 |
| lowa | 375 | 222 | 585 | 889 | 1,686 | 43 | 745 | 40 | 128 | 43 | 235 | 5,018 |
| Kansas | 566 | 285 | 658 | 839 | 2,007 | 41 | 965 | 23 | 106 | 41 | 184 | 5,767 |
| Kentucky | 688 | 415 | 725 | 1,449 | 2,897 | 59 | 1,511 | 39 | 202 | 50 | 345 | 8,433 |
| Louisiana | 926 | 632 | 834 | 2,266 | 4,024 | 80 | 2,112 | 54 | 323 | 80 | 313 | 11,714 |
| Maine | 331 | 152 | 545 | 404 | 853 | 15 | 881 | 19 | 53 | 32 | 155 | 3,460 |
| Marshall Islands | 5 | 8 | 8 | 4 | 14 | 0 | 10 | 1 | 0 | 0 | 1 | 51 |
| Maryland | 3,262 | 1,455 | 3,121 | 4,681 | 7,495 | 207 | 9,484 | 145 | 589 | 174 | 1,012 | 31,898 |
| Massachusetts | 2,670 | 698 | 2,736 | 2,451 | 3,918 | 182 | 5,073 | 103 | 289 | 137 | 927 | 19,297 |
| Michigan | 2,486 | 1,087 | 2,437 | 3,789 | 7,084 | 180 | 7,485 | 126 | 509 | 183 | 1,150 | 26,789 |
| Minnesota | 1,272 | 408 | 1,453 | 1,565 | 3,017 | 112 | 3,090 | 58 | 237 | 79 | 576 | 11,963 |
| Mississippi | 490 | 388 | 399 | 1,030 | 1,878 | 37 | 972 | 26 | 167 | 40 | 180 | 5,635 |
| Missouri | 1,228 | 812 | 1,298 | 2,164 | 4,513 | 96 | 3,225 | 70 | 288 | 99 | 648 | 14,522 |
| Montana | 124 | 78 | 222 | 289 | 688 | 10 | 325 | 8 | 36 | 12 | 75 | 1,881 |
| Nebraska | 371 | 153 | 417 | 429 | 1,267 | 23 | 625 | 20 | 88 | 24 | 176 | 3,612 |

TABLE 12: TOTAL COMPLAINTS BY LOCALITY AND PRODUCT

| | Bank account or services | Consumer Ioan | Credit card | Credit reporting | Debt collection | Money transfer | Mortgage | Other financial services | Payday Ioan | Prepaid | Student loans | Total |
|----------------------------------|--------------------------------|----------------------|-------------------------|-------------------------|-------------------------|---------------------|-------------------------|--------------------------------|----------------------|---------------------|----------------------|----------------------------|
| Nevada | 1,267 | 648 | 1,207 | 2,347 | 3,783 | 82 | 3,135 | 41 | 248 | 86 | 282 | 13,246 |
| New | ., | | ., | _, | | | | | | | | |
| Hampshire | 396 | 164 | 491 | 541 | 1,078 | 20 | 1,583 | 19 | 65 | 24 | 205 | 4,625 |
| New Jersey | 4,527 | 1,601 | 4,536 | 5,904 | 8,822 | 254 | 11,491 | 225 | 647 | 229 | 1,272 | 39,799 |
| New Mexico | 498 | 298 | 490 | 1,072 | 1,764 | 55 | 1,032 | 27 | 117 | 27 | 168 | 5,593 |
| New York | 8,576 | 2,314 | 9,664 | 11,703 | 14,615 | 567 | 16,062 | 350 | 472 | 411 | 2,533 | 67,708 |
| North Carolina | 2,849 | 1,593 | 2,988 | 4,970 | 7,339 | 183 | 7,358 | 140 | 464 | 166 | 766 | 29,053 |
| North Dakota | 80 | 49 | 107 | 202 | 385 | 8 | 137 | 8 | 15 | 7 | 38 | 1,041 |
| Northern Mariana | | | | _ | _ | | | | | | _ | 00 |
| Islands | 6 | 0 | 3 | 5 | 7 | 0 | 4 | 0 | 0 | 0 | 5 | 30 |
| Ohio | 3,125 | 1,688 | 3,677 | 4,430 | 9,616 | 193 | 6,932 | 134 | 639 | 224 | 1,433 | 32,306 |
| Oklahoma | 577 | 514 | 672 | 1,271 | 2,831 | 61 | 1,311 | 29 | 251 | 51 | 256 | 7,884 |
| Oregon | 1,263 | 433 | 1,330 | 1,593 | 3,512 | 66 | 3,095 | 63 | 171 | 81 | 471 | 12,184 |
| Palau | 1 | 1 | 1 | 3 | 1 | 0 | 6 | 0 | 0 | 0 | 0 | 13 |
| Pennsylvania | 4,468 | 1,665 | 4,155 | 5,757 | 9,888 | 254 | 8,334 | 192 | 626 | 222 | 1,746 | 37,538 |
| Puerto Rico | 334 | 145 | 367 | 701 | 504 | 15 | 471 | 15 | 5 | 7 | 54 | 2,661 |
| Rhode Island | 436 | 151 | 425 | 402 | 878 | 26 | 736 | 21 | 91 | 19 | 117 | 3,319 |
| South Carolina | 1,112 | 905 | 1,115 | 2,605 | 4,368 | 95 | 2,948 | 49 | 265 | 84 | 437 | 14,061 |
| South Dakota | 137 | 101 | 204 | 207 | 583 | 14 | 229 | 10 | 33 | 6 | 65 | 1,599 |
| Tennessee | 1,559 | 1,018 | 1,500 | 2,653 | 5,919 | 92 | 3,271 | 88 | 430 | 115 | 593 | 17,335 |
| Texas | 6,702 | 4,354 | 6,899 | 20,300 | 28,299 | 516 | 12,564 | 291 | 1,473 | 468 | 1,903 | 84,310 |
| Utah | 446 | 276 | 622 | 901 | 2,029 | 33 | 1,392 | 23 | 120 | 33 | 193 | 6,112 |
| Vermont | 207 | 78 | 252 | 235 | 355 | 11 | 406 | 6 | 20 | 17 | 97 | 1,691 |
| Virgin Islands | 34 | 10 | 39 | 66 | 51 | 5 | 50 | 2 | 4 | 1 | 4 | 268 |
| Virginia | 3,081 | 1,573 | 3,556 | 5,868 | 8,605 | 249 | 7,834 | 163 | 490 | 225 | 1,059 | 32,927 |
| Washington | 1,896 | 743 | 2,140 | 3,250 | 5,966 | 150 | 5,931 | 87 | 257 | 143 | 760 | 21,456 |
| West Virginia | 290 | 134 | 312 | 631 | 854 | 30 | 469 | 35 | 28 | 22 | 153 | 3,002 |
| Wisconsin | 1,126 | 545 | 1,589 | 1,446 | 3,683 | 84 | 2,671 | 49 | 279 | 112 | 501 | 12,180 |
| Wyoming | 67 | 64 | 113 | 185 | 394 | 5 | 203 | 9 | 34 | 3 | 47 | 1,137 |
| U.S. Armed Forces – | | | | | | | | | | | | |
| Americas | 10 | 1 | 6 | 1 | 24 | 1 | 9 | 2 | 1 | 2 | 2 | 61 |
| U.S. Armed Forces – Europe | 41 | 26 | 35 | 72 | 93 | 5 | 94 | 4 | 0 | 2 | 24 | 397 |
| U.S. Armed Forces – | | 18 | | | 90 | 2 | | | | | | |
| Pacific Unspecified | 2 456 | | 39 | 42 | | | 2 066 | 0 | 1 | 120 | 13 | 275 |
| Total | 3,456 105,195 | 781 47,058 | 3,053 109,328 | 1,746 177,469 | 6,288 285,754 | 537 7,465 | 3,966 256,737 | 221 4,685 | 478 16,348 | 129 6,399 | 410 33,713 | 21,898 1,058,082 |

| Company | 3 month average: Jul - Sep 2016 | % change vs. 3 month period last year | 3 month average % untimely: Jul - Sep 2016 |
|---|------------------------------------|--|---|
| Portfolio Recovery Associates, Inc. | 124.7 | -8% | 0% |
| Encore Capital Group | 123.0 | -34% | 0% |
| ERC | 83.0 | -28% | 0.4% |
| Citibank | 77.3 | 12% | 0% |
| Synchrony Financial | 73.7 | 32% | 0% |
| Capital One | 69.0 | 47% | 0.5% |
| JPMorgan Chase | 65.0 | 31% | 0.5% |
| Transworld Systems Inc. | 62.0 | -12% | 0% |
| Convergent Resources, Inc. | 49.3 | 21% | 0% |
| Diversified Consultants, Inc. | 48.7 | 30% | 0.7% |
| Wells Fargo | 42.3 | 76% | 16% |
| I.C. System, Inc. | 40.3 | 32% | 0% |
| Bank of America | 39.7 | 27% | 0% |
| Navient Solutions, Inc. | 39.0 | 19% | 0% |
| Afni, Inc. | 38.3 | -8% | 0% |
| Tenet HealthCare Corporation | 37.7 | 122% | 20% |
| Resurgent Capital Services L.P. | 33.0 | -3% | 1% |
| Southwest Credit Systems, L.P. | 32.0 | 146% | 88% |
| National Credit Systems, Inc. | 31.0 | 19% | 5% |
| Commonwealth Financial Systems, Inc. | 30.3 | 20% | 2% |
| Pinnacle Credit Services, LLC | 27.0 | 11% | 0% |
| Barclays PLC | 26.3 | 618% | 0% |
| Cavalry Investments, LLC | 26.0 | -10% | 0% |
| | | | |

TABLE 13: MOST-COMPLAINED-ABOUT COMPANIES FOR DEBT COLLECTION

| Company | 3 month average: Jul - Sep 2016 | % change vs. 3 month period last year | 3 month average % untimely: Jul - Sep 2016 |
|-------------------------------|------------------------------------|--|---|
| Hunter Warfield, Inc. | 24.3 | -3% | 0% |
| Stellar Recovery Inc. | 23.3 | 13% | 0% |
| CCS Financial Services, Inc. | 23.0 | 11% | 1% |
| CL Holdings, LLC | 21.0 | 11% | 0% |
| Discover | 20.0 | 43% | 0% |
| The CMI Group, Inc. | 19.0 | 30% | 0% |
| Debt Recovery Solutions, LLC | 18.3 | 67% | 0% |
| Amex | 16.3 | 96% | 0% |
| EOS Holdings, Inc. | 16.3 | -40% | 0% |
| I.Q. Data International, Inc. | 16.3 | 53% | 0% |
| ProCollect, Inc | 16.3 | 36% | 2% |
| The CBE Group, Inc. | 16.3 | -34% | 0% |

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