

Quantitative Survey Testing of Model Disclosure Clauses and Forms for Debt Collection

Methodology Report

January 21, 2020

Submitted to:
Consumer Financial
Protection Bureau

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Background

The CFPB is engaged in developing rules related to debt collection practices, and as part of this work has studied what consumers do and do not understand about the debt collection process. Based on this research, the agency developed and qualitatively tested models of validation notices that provide information to consumers about their debts and their rights and choices in relation to those debts. See 84 FR 23274, 23279 (May 21, 2019).

Building on the qualitative work, CFPB engaged ICF in September 2019 to quantitatively measure how variations of the language, content, and display in the validation notices affect consumer understanding and stated behavior.

The survey was conducted with 8,011 total respondents, with 5,312 having experienced debt collections.

The study was a web survey conducted with respondents who were panelists from Ipsos KnowledgePanel® (see Appendix B.) The panelists were randomly assigned to one of 18 versions of either the CFPB's proposed model validation notice or a validation notice similar to what some debt collectors currently use. The panelists were presented with a validation notice to read and then administered a web-based survey. The survey was limited to panelists participating on a desktop or laptop computer or a tablet. Panelists were not permitted to participate by mobile phone in order to minimize the amount of scrolling when taking the survey online.

Questionnaire Design

Originally the survey focused on the respondents' understanding of the following:

- Time-barred debt—a debt for which the statute of limitations has expired
- Obsolete debt—a debt that cannot appear on a credit report due to its age
- Debt revival—the concept that a debt that could not previously have been litigated on due to its age can be "revived" for litigation if a consumer makes a partial payment or acknowledges ownership of the debt

The participants in the survey were asked about actions they might take if they received the notice in certain hypothetical situations (vignettes).

The survey questionnaire was drafted by CFPB. ICF and CFPB jointly refined the questionnaire to a draft format for testing. The testing was conducted in two phases. Phase 1 focused on question validation and developing the hypothetical situation-based questionnaire structure. This occurred through three rounds of cognitive testing.

After Phase 1 of the questionnaire testing, the CFPB paused the project to assess the research objectives. Following the pause, the research objectives changed slightly by eliminating obsolete debt as a priority research objective and adding more questions about participants' understanding of the debt notice. Phase 2 of the questionnaire testing included cognitive testing and a live pilot test of the online instrument.



The final survey was submitted and received approval from the Office of Management and Budget (3170-0070) on May 7, 2019.

Questionnaire Testing - Phase 1

ICF conducted three rounds of cognitive interviews to qualitatively test the debt disclosure questions and the overall structure of the questionnaire. All testing was conducted at Shugoll Research in Bethesda, MD. All participants were given an incentive of \$75.

The purpose of the first two rounds of testing was to validate specific questions as well as assess the overall structure and content of the questionnaire. The first round of testing was conducted using a paper questionnaire. Since the survey was in early development, this allowed for more flexibility and efficiency in making changes. Once the general structure of the survey was in place, the second round was programmed for administering the surveys on the web. Each of the first two rounds of testing was conducted over two days with minor edits and clarifications to the questions between the two days. The third round of testing was to validate the final set of questions and make minor changes before fielding.

Exhibit 1. Summary of Cognitive Testing

Round	Dates	Format	Interviews
1	April 10, 2017	Paper and pencil	16
	April 12, 2017	survey	
2	April 26, 2017	Online survey	16
	April 28, 2017		
3	June 15, 2017	Online survey	8

Questionnaire Testing - Phase 2

Following Phase 1 of cognitive testing, the CFPB paused the project to review and modify research priorities as described above. Upon resuming, ICF conducted two days of cognitive interviews to qualitatively test debt disclosure questions and a pilot test as a dress rehearsal for the full survey.

Cognitive Testing

The main purpose of the testing was to validate new questions that had not been previously tested and the overall structure of the questionnaire. The cognitive testing was conducted at Shugoll Research in Bethesda, MD on February 21, 2019 and March 1, 2019. All participants were given an incentive of \$75.

The target number of cognitive interviews was nine per day. Three recruited participants did not show on Day 1, resulting in six interviews. One participant did not show on Day 2, resulting in eight interviews.



Pilot Test

A total of 201 respondents completed the survey between June 11 and 20, 2019. The pilot revealed two issues that were then changed for the full survey. First, missing data rates were high for the open ended question (THOUGHTLIST) and some respondents missed entire grids of questions. The "likely sue" question grid (Q10a, Q12a, Q14a, Q16a, Q21) and "legally allowed to sue" question grid (Q11a, Q13a, Q15a, Q17a, Q22) looked very similar on the screen, with only a slight wording difference in the question, "how likely would the debt collector be to sue" vs "do you think the debt collector is legally allowed to sue". The question grids are presented in Appendix A. Several respondents missed all questions on one grid while answering all questions on the other grid. In these cases, respondents probably believed they had already answered the questions and advanced without answering the second grid.

To address the missing data, soft prompts were added to the survey. If the respondent tried to advance the screen, but had not answered all questions, the text "Answer is Incomplete" was displayed for each unanswered question and the top of the screen displayed "Page has errors". The respondent was still allowed to advance without answering the questions.

The second issue was the percentage of respondents who were screening into the survey as having experienced debt collections. The original screening question was, "In the past year, since June 2018, have you been contacted by a debt collector, an attorney, a collection firm, or others trying to recover a debt from you?" This screening question only allowed for oversampling of people experiencing debt collection in the past 12 months, which was 11% of the people screened in the pilot. This question was broadened to allow for oversampling of people who had ever experienced debt collections:

Have you ever been contacted by a debt collector, an attorney, a collection firm, or others trying to recover a debt from you?

01 Yes, within past 12 months

02 Yes, within past 2 years (i.e. between 12 months and 2 years)

03 Yes, within past 5 years (i.e. between 2 years and 5 years)

04 Yes, 5 or more years ago

05 No, never been contacted

Survey Administration

Survey Programming

The final web survey was programmed in Voxco. The survey was limited to respondents who accessed the web link by desktop, laptop or tablet. Respondents who tried to access the survey through a mobile phone were asked to complete the survey on a larger device. This restriction occurred in two stages. First, respondents who initiated the screening survey received the following question:

To make sure you can view all the elements in this survey, we would like you to complete this survey on a laptop or desktop PC or tablet, if possible.



Do you have access to a laptop or desktop PC or tablet?

While Ipsos provides their panel members with technology (See Appendix B), this question was included to confirm that respondents used laptop, desktop PC, or tablet. Respondents who answered 'no' were not allowed to proceed. Those who answered 'yes' were asked to "Please exit this window and log on to your laptop, desktop PC, or tablet."

The screen size restriction was also in place for the main survey. If the respondent tried to access the survey on a mobile phone, they received the following pop-up message, "Thanks for your interest in the study. This survey is designed for larger screens; please connect using a computer or tablet."

The survey included a thumbnail of the validation notice that allowed the respondent to access the notice as needed to answer the questions. The final questionnaire is presented in



Appendix A - Web Survey.

Recruitment and Screening

The original target sample size of respondents completing the web survey was 8,000 with 5,667 (67%) having experienced debt collections, and 33% who have experienced debt collections in the past 12 months.

The sample was selected from the Ipsos KnowledgePanel, a probability-based web panel. The KnowledgePanel methodology is presented in Appendix B – Ipsos KnowledgePanel® Methodology. Ipsos randomly sampled households with at least one eligible adult. Selected panel members received an email invitation to complete the survey. The email invitation described the purpose and importance of the research, provided a link to the survey, and included an e-mail address and toll-free telephone number for helpdesk support. The link was a personalized URL for the web survey that included a unique, non-sequential identifier for secure login. When panelists clicked on the URL, they were directed to an Ipsos-hosted preliminary screener to determine eligibility based on debt collection experience. The screening questions are provided in *Appendix C – Screening Questions*.

Panelists were oversampled based on their debt collections experience using the question in Exhibit 2. Of those screened, 32% have experienced debt collections with 12% having experienced debt collections in the past two years. Sixty-six percent of the respondents completing the survey have experienced debt collections with 31% experiencing debt collections within the past five years and 24% experience debt collections within the past two years.

Panelists that were selected for the survey were redirected to the web survey hosted by ICF.

Exhibit 2. Debt Status Screening Question

Have you ever been contacted by a debt collector, an attorney, a collection firm, or others trying to recover a debt from you?	Screened	Selected	Complete
1 Yes, within past 12 months	1,685	1,573	1,460
2 Yes, within past 2 years (i.e. between 12 months and 2 years)	527	504	457
3 Yes, within past 5 years (i.e. between 2 years and 5 years)	649	613	566
4 Yes, 5 or more years ago	3,212	3,067	2,829
5 No, never been contacted	12,952	2,975	2,699

Data Collection

The survey was fielded from Aug 6, 2019 – Sep 22, 2019. A soft launch was conducted from Aug 6 – Aug 20 with 958 completed surveys. Following the review of the data, the remaining surveys were completed. The cumulative distribution of the completed surveys is presented in Exhibit 3.



After the initial invitation to conduct the survey, email reminders to non-responders were sent on Day 3 of the field period. An additional reminder was sent to non-responders on Day 7 of the field period. Additional reminders were sent to non-responders on September 20th. Upon completion, qualified respondents received an entry into the KnowledgePanel sweepstakes. The last 10% of respondents received a cash-equivalent incentive worth \$5.

The median time to complete the survey was 17 minutes. Once started, 89% of respondents completed all questions and 11% of respondents did not finish the survey.

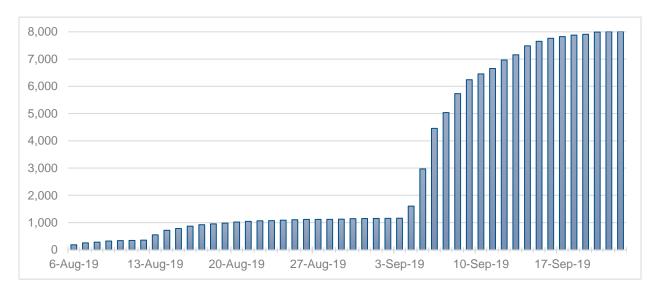


Exhibit 3. Cumulative Surveys by Date

Respondents were randomly assigned to 1 of 18 conditions, each with a varying validation notice type and number of years referenced in the scenario, 3 or 10 years. Two notices were control conditions. One control was designed to resemble validation notices that some debt collectors use today (G_X). The other control was the Bureau's model validation notice as proposed in the May 2019 Proposed Rule (X_3, X_10). Neither of the control notices contained a time-barred debt or revival disclosure. Four notices contained variations of a time-barred debt disclosure added to the Bureau's model notice (AC_3, AW_10, C_3, W_10), and five contained variations of both a time-barred debt disclosure and a revival disclosure added to the Bureau's model notice (R1_3, R1_10, R2_10, R3_10, R4_10, R5_10). The completed surveys by notice condition are presented in Exhibit 4. The validation notices are included in *Appendix D – Validation Notice*.

During the survey, the respondents were presented with the following scenario:

Person A bought a couch from Main Street Department Store [3 or 10] years ago using a Main Street Department Store credit card. The credit card company contacted Person A several times about the bill over the years, but Person A has not paid it off.

Person A receives a notice about the debt from North South Group, a debt collector. It says that he or she still owes some of the balance from the card. Person A knows that he or she does still owe some money, and thinks the amount on the notice looks about



right. It would not be easy, but Person A probably could find a way to come up with money to pay the debt.

Respondents were then shown a validation notice for the debt and asked to answer questions about the debt notice and the scenario, as well as their experiences and attitudes about debt collections.



Exhibit 4. Number of Completed Surveys by Validation Form

Disclosure Form Type†	Scenario Years	Started Survey	Completed Survey	Completion %	Median Length*
All form types		8,911	8,011	89.9%	17.0min
AC_3	3	466	420	90.1%	16.3
AC_10	10	501	458	91.4%	16.7
AW_3	3	496	444	89.5%	15.9
AW_10	10	507	447	88.2%	17.1
C_3	3	507	454	89.5%	17.6
C_10	10	480	416	86.7%	17.4
R1_3	3	490	448	91.4%	16.3
R1_10	10	494	450	91.1%	17.6
R2_10	10	518	459	88.6%	19.1
R3_10	10	471	425	90.2%	18.1
R4_10	10	521	471	90.4%	18.0
R5_10	10	510	465	91.2%	17.7
W_3	3	496	443	89.3%	16.2
W_10	10	499	455	91.2%	16.7
X_3	3	484	429	88.6%	16.9
X_10	10	492	446	90.7%	15.6
G_X	3	499	455	91.2%	15.4
G_X	10	480	426	88.8%	16.5

[†]The disclosure forms are provided in Appendix D.

Response Rate

Seventy-two percent of respondents responded to the screening questions related to debt collection experience (See Recruitment and Screening) Of those selected by the screening process to continue, 69% completed the main survey for a combined 50% response rate.

Data Deliverables

ICF provided the survey data, as well as the screening data and demographic data from KnowledgePanel. The file deliveries included an interim file after the soft launch with roughly 1000 respondents, and a final file with all respondents.



^{*}The median length does not include time for screening.

The file contains a survey weight for respondents that accounts for both the panel recruitment and the selection for this specific research, including the oversampling of panelists who have experienced debt collections. The weighting details are presented in *Appendix B – Ipsos KnowledgePanel® Methodology*.

Additional data files include:

- 1) KnowledgePanel demographics for nonrespondents and panelists screened out
- 2) Paradata including the time spent on each question/screen and the order of the rotated questions
- 3) Paradata measuring the number of times and the total time spent viewing the notice for each screen where the notice was displayed. This file also indicates whether the respondent scrolled down when viewing the notice.



Appendix A – Web Survey

INTRO SCREEN

Thank you for participating in this survey! The Consumer Financial Protection Bureau (CFPB) is a government agency that works to make financial products and services fair for consumers. This survey will ask you questions about debt collection.

Your opinions are very important to us. The survey is voluntary and will take about 20 minutes to finish.

Privacy Act Statement

5 U.S.C. 552(a)(e)(3)

The information you provide through your responses to ICF will assist the study sponsor, the Consumer Financial Protection Bureau ("CFPB"), in evaluating potential debt collection disclosure forms.

The CFPB will not obtain or access personally identifiable information. The agency will only obtain and access de-identified results and aggregated analyses of those results. This information will not be disclosed as outlined in the Routine Uses for the SORN.

This collection of information is authorized by Pub. L. No. 111-203, Title X, Sections 1013 and 1022, codified at 12 U.S.C. §§ 5493 and 5512.

Participation in this study is voluntary; you are not required to participate. However, if you do not include the requested information, you may not participate in the study.

For the assurances of confidentiality provided to respondents by KnowledgePanel, please see: http://www.knpanel.com/participate/privacy2.html.

If you have any questions about this survey, please contact Panel Relations at 1-800-782-6899.

//PROGRAMMER: INSERT PAGE BREAK//

INSTRUCTIONS

Use the buttons to get through the survey:

- Click on the NEXT button to save your responses and continue to the next page.
- Click on the BACK button to go back to a previous page. You may change your answers
 if you need to. Do not use your browser's Back button. This may cause you to exit the
 questionnaire.
 O1 Continue



SCEN1. Please read the scenario below about someone named Person A.

Person A bought a couch from Main Street Department Store [INSERT SCEN1YRS] years ago using a Main Street Department Store credit card. The credit card company contacted Person A several times about the bill over the years, but Person A has not paid it off.

Person A receives a notice about the debt from North South Group, a debt collector. It says that he or she still owes some of the balance from the card. Person A knows that he or she does still owe some money, and thinks the amount on the notice looks about right. It would not be easy, but Person A probably could find a way to come up with money to pay the debt.

Click "Next" to read the notice that Person A received in the mail. You will then be asked a series of questions that relate to the information in the notice.

01 Continue

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

NOTICE. PROGRAMMER: DISPLAY NOTICE

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

//START DISPLAY OF THUMBNAIL OF THE NOTICE ON THE RIGHT SIDE OF THE SCREEN//

NOTE1. At any time during this survey, you can look at the notice again by clicking the image on the right of the screen.

01 Continue



COMP1. According to the notice, if Person A wanted to make a payment on the debt, who should he or she send the payment to?

- 01 North South Group
- 02 Bank of Rockville
- 03 This information is not on the notice
- 88 MISSING ///HIDDEN///

//ASK ALL//

CONF1. How confident are you in your answer to the previous question?

- 01 Not at all confident
- 02 Somewhat confident
- 03 Very confident
- 88 MISSING ///HIDDEN///

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

COMP2. According to the notice, does Person A have a legal right to dispute this debt if he or she thinks there is an error?

- 01 Yes
- 02 No
- 03 It depends
- 88 MISSING ///HIDDEN///

//ASK ALL//

CONF2. How confident are you in your answer to the previous question?

- 01 Not at all confident
- 02 Somewhat confident
- 03 Very confident
- 88 MISSING ///HIDDEN///



COMP3. Imagine that Person A believes the debt on the notice is not correct. According to the notice, what must Person A do to have the debt collector send Person A information showing that he or she owes the debt?

- 01 Person A must write to the debt collector any time after receiving the notice.
- 02 Person A must write to the debt collector by April 30th (within 30 days of receipt of the notice).
- 03 Person A must write to the debt collector after April 30th (after 30 days of receipt of the notice).
- 04 Person A must call the debt collector immediately.
- 88 MISSING ///HIDDEN///

//ASK ALL//

CONF3. How confident are you in your answer to the previous question?

- 01 Not at all confident
- 02 Somewhat confident
- 03 Very confident
- 88 MISSING ///HIDDEN///

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

Pre_Q25a. //IF VALIDATION_MRK=1,2,3,4,5,6,7,8,9,10,11,12,13,14 (VALIDATION NOTICES= AC_3, AC_10, AW_3, AW_10, C_3, C_10, R1_3, R1_10, R2_10, R3_10, R4_10, R5_10, W_3, W_10) DISPLAY: Please take another look at this box of text that appears on the notice. The following questions relate to this text, so please make sure you read the text carefully before continuing. $\{POST_COMP\}$



//SHOW BOX WITH RELEVANT 1-2 SENTENCES//

BOX IF VALIDATION_MRK=1 OR 2 (AC_3 OR AC_10) THEN INSERT TEXT BOX FROM NOTICE



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we cannot sue you for it.

BOX IF VALIDATION_MRK=3 OR 4 (AW_3 OR AW_10) THEN INSERT TEXT BOX FROM NOTICE



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we will not sue you for it.

BOX IF VALIDATION_MRK=5 OR 6 (C_3 OR C_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we cannot sue you for it.

BOX IF VALIDATION_MRK=7 OR 8 (R1_3 OR R1_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it unless you make a payment or acknowledge it in writing.



BOX IF VALIDATION_MRK=9 (R2_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Take note: You can renew the debt and the statute of limitations for the filing of a lawsuit against you if you do any of the following: Make any payment on the debt, sign a paper in which you admit that you owe the debt or in which you make a new promise to pay; Sign a paper in which you give up or waive your right to stop the creditor from suing you in court to collect the debt.

BOX IF VALIDATION_MRK=10 (R3_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Even so, you may choose to make payments on the debt. However, be aware: if you make a payment on the debt, admit to owing the debt, promise to pay the debt, or waive the statute of limitations on the debt, the time period in which you can be sued may start again.



BOX IF VALIDATION_MRK=11 (R4_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Even so, you may CHOOSE to make payments on the debt. However, BE AWARE: if you make a payment [or acknowledge in writing that you owe the debt], our right to sue you to make you pay the entire debt may START AGAIN.

BOX IF VALIDATION MRK=12 (R5 10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. If you do nothing in response to this notice, we will not sue you to collect this debt. This is because the debt is too old. BUT if you make a payment or acknowledge in writing that you owe this debt, then we can sue you to collect it.

BOX IF VALIDATION_MRK=13 OR 14 (W_3 OR W_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it.

//NO

DISPLAY FOR VALIDATION_MRK 15,16,17,18 (VALIDATION NOTICE X_3, X_10, G_X).

01 Continue



PreQ1.

Please answer the following questions using a 5-point scale where 1 means "very unlikely" and 5 means "very likely." {PRE BEHAVIOR}

01 Continue

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

//DISPLAY NEWQ01- NEWQ03 ON SAME PAGE//
//RANDOMIZE ORDER OF NEWQ01 AND NEWQ02//

NEWQ01. If you were in Person A's situation, how likely would you be to <u>ignore this</u> notice and not respond to it? {WOULDIGNORE}

01 1 Very unlikely

02 2

03 3

04 4

05 5 Very likely

88 MISSING ///HIDDEN///

NEWQ02. If you were in Person A's situation, how likely would you be to <u>make a full or partial</u> <u>payment on this debt?</u> {WOULDPAY}

01 1 Very unlikely

02 2

03 3

04 4

05 5 Very likely

88 MISSING ///HIDDEN///

//OPEN END: 1,000 CHARACTERS MAX//

NEWQ03. When you answered the two questions above, what were you thinking about? Please list everything you were thinking about in the space below. {THOUGHTLIST}



Pre Q25a 2. //IF VALIDATION MRK=1,2,3,4,5,6,7,8,9,10,11,12,13,14 (VALIDATION NOTICE= S= AC_3, AC_10, AW_3, AW_10, C_3, C_10, R1_3, R1_10, R2_10, R3_10, R4_10, R5 10, W 3, W 10) DISPLAY: Please take another look at this box of text that appears on the notice. The following questions relate to this text, so please make sure you read the text carefully before continuing. {POST_COMP_2}

//SHOW BOX WITH RELEVANT 1-2 SENTENCES//

BOX IF VALIDATION_MRK=1 OR 2 (AC_3 OR AC_10) THEN INSERT TEXT BOX FROM NOTICE



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we cannot sue you for it.

BOX IF VALIDATION_MRK=3 OR 4 (AW_3 OR AW_10) THEN INSERT TEXT BOX FROM NOTICE



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we will not sue you for it.

BOX IF VALIDATION MRK=5 OR 6 (C 3 OR C 10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we cannot sue you for it.

BOX IF VALIDATION_MRK=7 OR 8 (R1_3 OR R1_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it unless you make a payment or acknowledge it in writing.



BOX IF VALIDATION_MRK=9 (R2_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Take note: You can renew the debt and the statute of limitations for the filing of a lawsuit against you if you do any of the following: Make any payment on the debt, sign a paper in which you admit that you owe the debt or in which you make a new promise to pay; Sign a paper in which you give up or waive your right to stop the creditor from suing you in court to collect the debt.

BOX IF VALIDATION_MRK=10 (R3_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Even so, you may choose to make payments on the debt. However, be aware: if you make a payment on the debt, admit to owing the debt, promise to pay the debt, or waive the statute of limitations on the debt, the time period in which you can be sued may start again.



BOX IF VALIDATION_MRK=11 (R4_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Even so, you may CHOOSE to make payments on the debt. However, BE AWARE: if you make a payment [or acknowledge in writing that you owe the debt], our right to sue you to make you pay the entire debt may START AGAIN.

BOX IF VALIDATION_MRK=12 (R5_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. If you do nothing in response to this notice, we will not sue you to collect this debt. This is because the debt is too old. BUT if you make a payment or acknowledge in writing that you owe this debt, then we can sue you to collect it.

BOX IF VALIDATION_MRK=13 OR 14 (W_3 OR W_10) THEN INSERT TEXT BOX FROM NOTICE



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it.

//NO DISPLAY FOR VALIDATION_MRK 15,16,17,18 (VALIDATION NOTICE X_3, X_10, G_X).



//ASK ALL//
//RANDOMIZE QUESTION SETS:
PRE_Q10, Q10A, Q12A, Q14A, Q16A, Q21
PRE_Q11, Q11A, Q13A, Q15A, Q17A, Q22 //

Pre_Q10. Based on what you read in the notice, how likely would the debt collector be to sue Person A to collect the debt in each of the following situations? Please treat each of these situations separately. {PRE_LIKELYSUE}

	1 – Very unlikely to sue	2	3	4	5 – Very likely to sue
//ASK ALL// Q10a. Person A makes a payment of \$100 toward the debt referenced in the notice. {LIKELYSUE1}					
//ASK ALL// Q12a. Person A sends a letter to the debt collector saying, "I know I owe the debt, but I have some questions about it before I					
pay." {LIKELYSUE2} //ASK ALL// Q14a. Person A calls the debt collector and says, "I know I owe the debt, but I have some questions about it before I now."					
before I pay." {LIKELYSUE3} //ASK ALL// Q16a. Person A ignores the notice and takes no action. {LIKELYSUE4}					
//ASK IF NOT VERSION CC// Q21. Person A thinks that there is a mistake in the notice. He or she mails in the tear-off portion on the bottom of the notice,					
checking the box that says, "I want to dispute this debt." {LIKELYSUE5}					



Pre_Q11.

Based on what you read in the notice, do you think the debt collector is <u>legally allowed</u> to sue Person A in each of the following situations? Please treat each of these situations separately. {PRE_LEGALLOW}

	1 – Yes, they are legally allowed to sue	2No, they are not legally allowed to	3—It depends	97—Not sure/Don't know
// CT7 A T T //		sue		
//ASK ALL// Q11a. Person A makes a payment of \$100 toward the debt referenced in the notice. {LEGALLOW1}				
//ASK ALL// Q13a. Person A sends a letter to the debt collector saying, "I know I owe the debt, but I have some questions about it before I pay." {LEGALLOW2}				
//ASK ALL//Q15a. Person A calls the debt collector and says, "I know I owe the debt, but I have some questions about it before I pay." {LEGALLOW3}				
//ASK ALL// Q17a. Person A ignores the notice and takes no action. {LEGALLOW4}				
//ASK IF NOT VERSION CC// Q22. Person A thinks that there is a mistake in the notice. He or she mails in the tear-off portion on the bottom of the notice, checking the box that says, "I want to dispute this				
debt." {LEGALLOW5}				



DISPUTE1. How clear are the instructions provided in the notice for how to dispute the debt?

- 01 Not at all clear
- 02 Only a little clear
- 03 Somewhat clear
- 04 Very clear
- 88 MISSING ///HIDDEN///

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

DISPUTE2. If you were Person A and you wanted to dispute the debt, how would you do so? *Please check all that apply*.

- 01 I would call the debt collector using the number on the notice
- 02 I would write to the debt collector
- 03 //PROGRAMMER: DISPLAY THIS OPTION IF NOTICE=X OR R1_3// I would fill out the tear-off at the bottom of the notice
- 04 I would do something else
- 05 I don't know
- 88 MISSING ///HIDDEN///

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

//END DISPLAY OF THUMBNAIL OF THE NOTICE ON THE RIGHT SIDE OF THE SCREEN//

Pre_Q33. Now we have a few questions about your opinions and experiences.

{PRE_ATT}

01 CONTINUE



//ASK ALL// //DISPLAY AS GRID - RANDOMIZE Q3301 THROUGH Q3309//

Q33. Please indicate your degree of agreement or disagreement with each of the following statements about debt and debt collection, using a 5-point scale where 1 means "definitely disagree" and 5 means "definitely agree".

	1 — definitely disagree	2	3	4	5 – definitely agree
Q3301. People should pay their debts even if money is tight. {ATT1}					
Q3303. Debt collectors generally have accurate information about the debts that they are asking people to pay. {ATT2}					
Q3305. If a debt collector sues a consumer, it is because the debt collector has some evidence that proves that the consumer owes the debt. {ATT3}					
Q3306. Debt collectors will often sue consumers if they do not pay their debts. {ATT4}					

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

Q34. How frequently do you check your credit report? {CREPORT}

- 01 4 or more times per year
- 02 2-3 times per year
- 03 Once per year
- 04 Less than once per year
- 05 I have never checked my credit report
- 88 MISSING ///HIDDEN///



Q35. Have you ever been contacted by a debt collector attempting to collect a debt from you? <u>Do include</u> instances when you were contacted about debts that you believed you did not owe. <u>Do not include</u> instances when a creditor or debt collector contacted you by mistake because they had the wrong phone number or address.{DEBTEXP}

- 01 Yes, I have been contacted about five or more debts
- 02 Yes, I have been contacted about two to four debts
- 03 Yes, I have been contacted about one debt
- 04 No
- 88 MISSING ///HIDDEN///

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

Q36. Have you ever been <u>sued</u> by a debt collector or creditor attempting to collect a debt from you? {SUEDEXP}

- 01 Yes, five or more times
- 02 Yes, two to four times
- 03 Yes, one time
- 04 No
- 88 MISSING ///HIDDEN///



EDISDELIVERY. Next, imagine you had to receive a notice from a debt collector telling you that you owe a debt, and that you have the option of receiving it by postal mail, email, or text message. Please rate how willing you would be to receive the notice through each of these methods.

	1-Not at all willing	2-Only a little willing	3-Somewhat willing	4-Very willing
EDISDELIVERYa. By postal mail				
EDISDELIVERYb. By email				
EDISDELIVERYc. By clicking a link delivered in an email				
EDISDELIVERYd. By clicking a link delivered in a text message				

//PROGRAMMER: INSERT PAGE BREAK//

//ASK ALL//

SUBMIT. Thank you for completing this survey! If you are ready to submit your responses, please click the SUBMIT button below. Once you submit your responses you will not be able to return to the survey or change any answers.

//PROGRAMMER - "NEXT" BUTTON TEXT SHOULD BE REPLACED WITH "SUBMIT" TEXT FOR THIS PAGE ONLY//

//PROGRAMMER: INSERT PAGE BREAK//

//ASK IF SUBMIT//

Thank. Thank you for your participation. Your answers have been submitted. The information you have provided will help the Consumer Financial Protection Bureau (CFPB) better understand how you and others perceive the current debt collection process.

You may now close your browser.



Appendix B – Ipsos KnowledgePanel® Methodology

Introduction

Ipsos is passionate about social science, health, and public policy research. We collaborate closely with client teams throughout the research process, while applying rigor in every step. We specialize in innovative online research that consistently gives leaders in academia, government, and business the confidence to make important decisions. Ipsos delivers affordable, statistically valid online research through KnowledgePanel® and leverages a variety of other assets, such as world-class advanced analytics, an industry-leading physician panel, an innovative platform for measuring online ad effectiveness, and a research-ready behavioral database of frequent supermarket and drug store shoppers.

Ipsos has recruited the first online research panel that is representative of the entire U.S. population. Panel members are randomly recruited through probability-based sampling, and households are provided with access to the Internet and hardware if needed.

Ipsos recruits panel members by using address-based sampling (ABS) methods (previously Ipsos relied on random-digit dialing [RDD] methods). Once household members are recruited for the panel and assigned to a study sample, they are notified by email for survey taking, or panelists can visit their online member page for survey taking (instead of being contacted by telephone or postal mail). This allows surveys to be fielded quickly and economically. In addition, this approach reduces the burden placed on respondents, since email notification is less intrusive than telephone calls and most respondents find answering online questionnaires more interesting and engaging than being questioned by a telephone interviewer. Furthermore, respondents have the convenience to choose what day and time to complete their assigned survey.

Ipsos Public Affairs

Ipsos Public Affairs has a strong tradition in working with sophisticated academic, government, and commercial researchers to provide high quality research, samples, and analyses. The larger Ipsos offers the fundamental knowledge for governmental agencies, academics, industries, industry, retailers, services companies and the media need to provide exceptional quality in research to make effective decisions. It delivers a comprehensive range of information and consultancy services. Ipsos is one of the leading survey research organizations worldwide, operating in 90 countries with over 16,000 employees.

For further information, visit our website: www.ipsos.com.

KnowledgePanel Methodology

KnowledgePanel is the largest online panel that relies on probability-based sampling techniques for recruitment; hence, it is the largest national sampling frame from which fully representative samples can be generated to produce statistically valid inferences for study populations. Our

panel provides samples with the highest level of representativeness available in online research for measurement of public opinions, attitudes, and behaviors. The panel was first developed in 1999 by Knowledge Networks, an Ipsos company. Panel members are randomly selected so that survey results can properly represent the U.S. population with a measurable level of accuracy, features that are not obtainable from nonprobability panels (for comparisons of results from probability versus nonprobability methods, see Yeager et al., 2011¹).

KnowledgePanel's recruitment process was originally based exclusively on a national RDD sampling methodology. In 2009, in light of the growing proportion of cellphone-only households, Ipsos migrated to an ABS recruitment methodology via the U.S. Postal Service's Delivery Sequence File (DSF). ABS not only improves population coverage, but also provides a more effective means for recruiting hard-to-reach individuals, such as young adults and minorities. Households without Internet connection are provided with a web-enabled device and free Internet service.

After initially accepting the invitation to join the panel, participants are asked to complete a short demographic survey (the initial Core Profile Survey); answers to this survey allow efficient panel sampling and weighting for future surveys. Upon completing the Core Profile Survey, participants become active panel members. All panel members are provided privacy and confidentiality protections.

ABS Recruitment

To enhance the DSF-based sampling frame used for address selection, we have various ancillary data appended to each household address, thus facilitating complex stratification plans.2 Taking advantage of such refinements, quarterly samples are selected using a disproportionate stratified sampling methodology across four strata to address differential attrition rates:

- 1. Hispanic households with at least one 18 to 24 year-old
- 2. Remaining Hispanic households
- 3. Remaining households with at least one 18 to 24 year-old
- 4. All remaining households

Adults from sampled households are invited to join KnowledgePanel through a series of mailings, including an initial invitation letter, a reminder postcard, and a subsequent follow-up letter. Moreover, telephone refusal-conversion calls are made to nonresponding households for which a telephone number could be matched to a physical address. Invited households can join the panel by:

Yeager, D., Krosnick, J., Chang, L., Javitz, H., Levendusky, M., Simper, A. and R. Wang (2011).
"Comparing the Accuracy of RDD Telephone Surveys and Internet Surveys Conducted With Probability and Non-Probability Samples." Public Opinion Quarterly, Winter 2011.

² Fahimi, M. and D. Kulp (2009). "Address-Based Sampling – Alternatives for Surveys That Require Contacts with Representative Samples of Households." Quirk's Marketing Research Review, May 2009.

- Completing and mailing back a paper form in a postage-paid envelope
- Calling a toll-free hotline phone number maintained by Ipsos
- Going to a designated Ipsos website and completing the recruitment form online

Household Member Recruitment

During the initial recruitment survey, all household members are enumerated. Following enumeration, attempts are made to recruit every household member who is at least 13 years old to participate in KnowledgePanel surveys. For household members aged 13 to 17, consent is collected from the parents or the legal guardian during the initial recruitment interview. No direct communication with teenagers is attempted before obtaining parental consent. While surveys can be conducted with these teens directly, in most instances teen surveys are conducted by first selecting a sample of active members who are parents. This parent route alternative makes it possible to reach a larger sample of teens.

Survey Sampling from KnowledgePanel

Once panel members are recruited and profiled by completing our Core Profile Survey, they become eligible for selection for client surveys. Typically, specific survey samples are based on the equal probability selection method (EPSEM) for general population surveys. Customized stratified random sampling based on "profile" data can also be implemented as required by the study design. Profile data can also be used when a survey calls for pre-screening—that is, members are drawn from a subsample of the panel, such as females, Republicans, grocery shoppers, etc. (This can reduce screening costs, particularly for rare subgroups.) In such cases, we take care to ensure that all subsequent survey samples drawn that week are selected in such a way as to result in a sample that remains representative of the panel distributions.

Survey Administration

Once assigned to a survey, members receive a notification email letting them know there is a new survey available for them to complete. This email notification contains a link that sends them to the survey. No login name or password is required. The field period depends on the client's needs and can range anywhere from a few hours to several weeks.

After three days, automatic email reminders are sent to all non-responding panel members in the sample. Additional email reminders are sent as needed. To assist panel members with their survey taking, each individual has a personalized member portal listing all assigned surveys that have yet to be completed.

Ipsos also operates an ongoing modest incentive program to encourage participation and create member loyalty. The incentive program includes special raffles and sweepstakes with both cash rewards and other prizes to be won. Typically, we assign panel members no more than one survey per week. On average, panel members complete two to three surveys per month with durations of 10 to 15 minutes per survey. An additional incentive is usually provided for longer surveys.

Response Rates

As a member of the American Association of Public Opinion Research (AAPOR), Ipsos follows the AAPOR standards for response rate reporting. While the AAPOR standards were established for single survey administrations and not for multi-stage panel surveys, we use the Callegaro-DiSogra $(2008)^3$ algorithms for calculating KnowledgePanel survey response rates. Generally, the KnowledgePanel survey completion rate is about 60%, with minor variations due to survey length, topic, sample specifications, and other fielding characteristics. In contrast, virtually all surveys that employ nonprobability online panels typically achieve survey completion rates in the low single digits. This means that — aside from the fact that nonprobability panels are inherently not representative of any known populations — the effective size of KnowledgePanel (55,000 panel members \times 0.60 completion rate = 33,000 respondents) would be equivalent to a nonprobability panel with 1,650,000 members that on average secures completion rates close to 2% (1,650,000 panel members \times 0.02 = 33,000 respondents).

Ipsos KnowledgePanel Weighting

Sample Weighting

As detailed above, significant resources and infrastructure are devoted to the recruitment process for KnowledgePanel so that our active panel members can properly represent the adult population of the U.S. This representation is achieved not only with respect to a broad set of geodemographic indicators, but also for hard-to-reach adults (such as those without Internet access or Spanish-language-dominant Hispanics) who are recruited in proper proportions. Consequently, the raw distribution of KnowledgePanel mirrors that of the U.S. adults fairly closely, barring occasional disparities that may emerge for certain subgroups due to differential attrition.

For selection of general population samples from KnowledgePanel, a patented methodology has been developed that ensures all samples behave as EPSEM samples. Briefly, this methodology starts by weighting the pool of active members to the geodemographic benchmarks secured from the latest March supplement of the U.S. Census Bureau's Current Population Survey (CPS) along several dimensions. Using the resulting weights as measures of size, a probability-proportional-to-size (PPS) procedure is used to select study specific samples. It is the application of this PPS methodology with the imposed size measures that produces fully self-weighing samples from KnowledgePanel, for which each sample member can carry a design weight of unity. Moreover, in instances where a study design requires any form of oversampling

³ Callegaro, M. and C. DiSogra (2008). "Computing Response Metrics for Online Panels." *Public Opinion Quarterly*, Vol. 72, No. 5.

of certain subgroups, such departures from an EPSEM design are accounted for by adjusting the design weights in reference to the CPS benchmarks for the population of interest.

The geodemographic benchmarks used to weight the active panel members for computation of size measures include:

- Gender (Male/Female)
- Age (18–29, 30–44, 45–59, and 60+)
- Race/Hispanic ethnicity (White/Non-Hispanic, Black/Non-Hispanic, Other/Non-Hispanic,
 2+ Races/Non-Hispanic, Hispanic)
- Education (Less than High School, High School, Some College, Bachelor and beyond)
- Census Region (Northeast, Midwest, South, West)
- Household income (under \$10k, \$10K to <\$25k, \$25K to <\$50k, \$50K to <\$75k, \$75K to <\$100k, \$100K to <\$150k, and \$150K+)
- Home ownership status (Own, Rent/Other)
- Metropolitan Area (Yes, No)

Study-Specific Post-Stratification Weights

Once all survey data have been collected and processed, design weights are adjusted to account for any differential nonresponse that may have occurred. Depending on the specific target population for a given study, geodemographic distributions for the corresponding population are obtained from the CPS, the U.S. Census Bureau's American Community Survey (ACS), or in certain instances from the weighted KnowledgePanel profile data. For this purpose an iterative proportional fitting (raking) procedure is used to produce the final weights. In the final step, calculated weights are examined to identify and, if necessary, trim outliers at the extreme upper and lower tails of the weight distribution. The resulting weights are then scaled to aggregate to the total sample size of all eligible respondents.

1. Start with the base weights of assignees, weight all screened respondents to represent the ages 18+ population.

weighting variables

- Gender (Male and Female) by Age (18-29, 30-44, 45-59, 60+)
- Race-Ethnicity (White/Non-Hispanic, Black/Non-Hispanic, Other/Non-Hispanic, Hispanic, 2+ Races/Non-Hispanic)
- Census Region (Northeast, Midwest, South, and West) by Metropolitan Status (Metro and Non-Metro)
- Education (Less than High School or High School, Some College, Bachelor or higher)
- Household Income (Under \$25K, \$25K-\$49,999, \$50K-\$74,999, \$75K-\$99,999, \$100K and Over)

The resulting weights are trimmed and scaled to sum to the un-weighted sample size of total screened respondents (screenwt; n=23110)

- 2. Use the weights from step (1) to derive the Eligible benchmarks based on weighted screener respondents.
- 3. Start with the screener weights, weight all qualified respondents to represent Eligible benchmarks with demos controlled within debt and non-debt.

weighting variables within debt and non-debt

- Gender (Male and Female) by Age (18-29, 30-44, 45-59, 60+)
- Race-Ethnicity (White/Non-Hispanic, Black/Non-Hispanic, Other/Non-Hispanic, Hispanic, 2+ Races/Non-Hispanic)
- Census Region (Northeast, Midwest, South, and West) by Metropolitan Status (Metro and Non-Metro)
- Education (Less than High School or High School, Some College, Bachelor or higher)
- Household Income (Under \$25K, \$25K-\$49,999, \$50K-\$74,999, \$75K-\$99,999, \$100K and Over)

The resulting weights are trimmed and scaled to sum to the un-weighted sample size of total qualified respondents (weight; n=8011).

Trimming

weight:

qualified for debt: (1.49%, 98.51%) qualified for non-debt: (1.89%, 98.18%)

Design Effect : weight: 3.0071

Appendix C – Screening Questions

- Q1: Do you work or have you ever worked for an organization that is involved in debt collection?
 - 1. Yes \rightarrow Not eligible
 - 2. No \rightarrow Continue
- Q2: Do you work or have you ever worked for a consumer rights non-profit related to the banking or financial industries?
 - 1. Yes \rightarrow Not eligible
 - 2. No \rightarrow Continue
- Q3: Over the next five years, do you expect the U.S. economy as a whole to perform better, worse, or about the same as it has over the past five years?
 - 1. Better
 - 2. Worse
 - 3. About the same
- Q4: Do you currently have a checking or savings account now?
 - 1. Yes
 - 2. No.
- Q5: Have you (and your spouse/partner) applied for any type of credit or loan in the last five years?
 - 1. Yes
 - 2. No
 - 3. Don't Know
- Q6: Was there any time in the past five years that you or your spouse/partner thought of applying for credit at a particular place, but changed your mind because you thought you might be turned down?
 - 1. Yes
 - 2. No
 - 3. Don't Know
- Q7: Have you ever been contacted by a debt collector, an attorney, a collection firm, or others trying to recover a debt from you?
 - 1. Yes, within past 12 months
 - 2. Yes, within past 2 years (i.e. between 12 months and 2 years)
 - 3. Yes, within past 5 years (i.e. between 2 years and 5 years)
 - 4. Yes, 5 or more years ago
 - 5. No, never been contacted \rightarrow Select subsample



Appendix D – Validation Notice



To: Person A
2323 Park Street
Apartment 123
Bethesda, MD 20800

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, 2016, you owed:		\$ 2,234.56
Between January 2, 2016 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



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we cannot sue you for it.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor. If you write by April 30, 2019, we will 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.NorthSouthGroup.com/ request.
- Learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you. Go to www.consumerfinance.gov.
- Contact us about your payment options.
- Review state law disclosures on reverse side, if applicable.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

3

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 342 Bethesda, MD 20800

How do you want to respond?

now do you want to re	spondr
Check all that apply: I want to dispute the debt be	agguege I thinks
☐ This is not my debt. ☐ The amount is wrong. ☐ Other (please describe of attach additional informations)	on reverse or
☐ I want you to send me the address of the original cr	
☐ I enclosed this amount:	\$
Make your check payable to Ba Include the reference number 5	

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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, 2009, you owed:		\$ 2,234.56
Between January 2, 2009 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



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we cannot sue you for it.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor. If you write by April 30, 2019, we will 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.NorthSouthGroup.com/ request.
- Learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you. Go to www.consumerfinance.gov.
- Contact us about your payment options.
- Review state law disclosures on reverse side, if applicable.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 132 Bethesda, MD 20800

How do you want to respond?

non do you mant to recpond?
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 Bank of Rockville.

Include the reference number 584-345.

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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, 2016, you owed:		\$ 2,234.56
Between January 2, 2016 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
Total amount of the dept now.	φ 2,204.30



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we will not sue you for it.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor. If you write by April 30, 2019, we will 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.NorthSouthGroup.com/ request.
- Learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you. Go to www.consumerfinance.gov.
- Contact us about your payment options.
- Review state law disclosures on reverse side, if applicable.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How do you want to respond?

non do you mant to recpond?
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 Bank of Rockville.

Include the reference number 584-345.

To: Person A
2323 Park Street
Apartment 123
Bethesda, MD 20800

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, 2009, you owed:		\$ 2,234.56
Between January 2, 2009 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



According to the law, you can't be sued for debts over a certain age. Because of the age of this debt, we will not sue you for it.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor. If you write by April 30, 2019, we will 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.NorthSouthGroup.com/ request.
- Learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you. Go to www.consumerfinance.gov.
- Contact us about your payment options.
- Review state law disclosures on reverse side, if applicable.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

3

How do you want to respond?

Mail this form to: North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

Check all that apply:
$\hfill \square$ 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 *Bank of Rockville*. Include the reference number 584-345.

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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, 2016, you owed:		\$ 2,234.56
Between January 2, 2016 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



The law limits how long you can be sued for a debt. Because of the age of this debt, we cannot sue you for it.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor. If you write by April 30, 2019, we will 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.NorthSouthGroup.com/ request.
- Learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you. Go to www.consumerfinance.gov.
- Contact us about your payment options.
- Review state law disclosures on reverse side, if applicable.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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 of attach additional informations)			
☐ I want you to send me the address of the original cr			
☐ I enclosed this amount:	\$		
Make your check payable to <i>Bank of Rockville</i> . Include the reference number 584-345.			

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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, 2009, you owed:		\$ 2,234.56
Between January 2, 2009 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



The law limits how long you can be sued for a debt. Because of the age of this debt, we cannot sue you for it.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor. If you write by April 30, 2019, we will 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.NorthSouthGroup.com/ request.
- Learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you. Go to www.consumerfinance.gov.
- Contact us about your payment options.
- Review state law disclosures on reverse side, if applicable.
- Póngase en contacto con nosotros para solicitar una copia de este formulario en español.

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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 of attach additional informations)			
☐ I want you to send me the name and address of the original creditor.			
☐ I enclosed this amount:	\$		
Make your check payable to <i>Bank of Rockville</i> . Include the reference number 584-345.			

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

Reference: 584-345

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Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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 of attach additional informations)			
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Our information shows:

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Between January 2, 2009 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



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it unless you make a payment or acknowledge it in writing.

How can you dispute the debt?

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Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How do you want to respond?

now 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 <i>Bank of Rockville</i> Include the reference number 584-345.

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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.

Total amount of the debt now: \$ 2,284.5			2,284.56
You paid or were credited this amount toward the debt:	-	\$	50.00
You were charged this amount in fees:	+	\$	25.00
You were charged this amount in interest:	+	\$	75.00
Between January 2, 2009 and today:			
As of January 2, 2009, you owed:		\$	2,234.56



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Take note: You can renew the debt and the statute of limitations for the filing of a lawsuit against you if you do any of the following: Make any payment on the debt, sign a paper in which you admit that you owe the debt or in which you make a new promise to pay; Sign a paper in which you give up or waive your right to stop the creditor from suing you in court to collect the debt.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

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Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How do you want to re	espond?			
Check all that apply: I want to dispute the debt I	pecause I think:			
☐ This is not my debt.☐ The amount is wrong.☐ Other (please describe of attach additional informational)				
☐ I want you to send me the name and address of the original creditor.				
☐ I enclosed this amount:	\$			
Make your check payable to Ba Include the reference number 5				

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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, 2009, you owed:		\$ 2,234.56
Between January 2, 2009 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
	T -,



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Even so, you may choose to make payments on the debt. However, be aware: if you make a payment on the debt, admit to owing the debt, promise to pay the debt, or waive the statute of limitations on the debt, the time period in which you can be sued may start again.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

What else can you do?

- Write to ask for the name and address of the original creditor. If you write by April 30, 2019, we will 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.NorthSouthGroup.com/ request.
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Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How do you want to respond?

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	k all that apply:	haaassa l Abimles
ш і	want to dispute the debt	because i think:
	This is not my debt.	
	The amount is wrong.	
	Other (please describe of	on reverse or
	attach additional informa	ation).
	want you to send me the ddress of the original c	
ΠΙ	enclosed this amount:	\$
	e your check payable to Ba	

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

Reference: 584-345

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Our information shows:

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

Total amount of the debt nave		•	0.004.50
You paid or were credited this amount toward the debt:	_	\$	50.00
You were charged this amount in fees:	+	\$	25.00
You were charged this amount in interest:	+	\$	75.00
Between January 2, 2009 and today:			
As of January 2, 2009, you owed:		\$	2,234.56

Total amount of the debt now:	\$ 2,284.56



The law limits how long you can be sued for a debt. Because of the age of this debt, we will not sue you for it. Even so, you may CHOOSE to make payments on the debt. However, BE AWARE: if you make a payment [or acknowledge in writing that you owe the debt], our right to sue you to make you pay the entire debt may START AGAIN.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, 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 you may write to us without the form. You may also include supporting documents. We accept disputes electronically at www.NorthSouthGroup.com/dispute.

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Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How do you want to re	spona?			
Check all that apply: ☐ I want to dispute the debt I	because I think:			
☐ This is not my debt.☐ The amount is wrong.☐ Other (please describe of attach additional informations)				
☐ I want you to send me the name and address of the original creditor.				
☐ I enclosed this amount:	\$			
Make your check payable to Ba Include the reference number 5				

To: Person A
2323 Park Street
Apartment 123
Bethesda, MD 20800

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:

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As of January 2, 2009, you owed:		\$ 2,234.56
Between January 2, 2009 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	+.50
	+. OD



The law limits how long you can be sued for a debt. If you do nothing in response to this notice, we will not sue you to collect this debt. This is because the debt is too old. BUT if you make a payment or acknowledge in writing that you owe this debt, then we can sue you to collect it.

How can you dispute the debt?

- Call or write to us by April 30, 2019, 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 April 30, 2019, we must stop collection on any amount you dispute until we send you information that shows you owe the debt.
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3

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How d	0 4011	want to	roenon	42
now a	o vou	wani io	respon	u

How do you want to re	espona?
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 of attach additional information)	
☐ I want you to send me the address of the original cr	
☐ I enclosed this amount:	\$
Make your check payable to Ba Include the reference number 8	

To: Person A
2323 Park Street
Apartment 123
Bethesda, MD 20800

Reference: 584-345

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3

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How do you want to respond?

How do you want to re	spona?			
Check all that apply: ☐ I want to dispute the debt I	because I think:			
☐ This is not my debt.☐ The amount is wrong.☐ Other (please describe of attach additional informations)				
☐ I want you to send me the name and address of the original creditor.				
☐ I enclosed this amount:	\$			
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To: Person A
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Apartment 123
Bethesda, MD 20800

Reference: 584-345

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You were charged this amount in fees:	+	\$ 25.00
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3

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 *Bank of Rockville*. Include the reference number 584-345.

□ Quiero esta forma en español

Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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.

\$ 2,284.56

Our information shows:

Total amount of the debt now:

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

	\$	2,234.56
+	\$	75.00
+	\$	25.00
-	\$	50.00
	+ +	+ \$

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North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

How	do	VOII	want to	raenc	nd?
пuw	uu	vou	wall to	resuc	niu :

How do you want to re	spond?
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☐ This is not my debt.☐ The amount is wrong.☐ Other (please describe of attach additional informations)	
☐ I want you to send me the address of the original cr	
☐ I enclosed this amount:	\$
Make your check payable to Ba Include the reference number 5	

To: Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

Reference: 584-345

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Between January 2, 2009 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?

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Mail this form to:

North South Group P.O. Box 123456 Pasadena, CA 91111-1234

Person A 2323 Park Street Apartment 123 Bethesda, MD 20800

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 <i>Bank of Rockville</i> . Include the reference number 584-345.



P.O. Box 123456 Pasadena, CA 91111-1234

[3/31/2019]

Address Service Requested

A98 A97

Person A 2323 Park Street Apartment 123 Bethesda MD, 20800

North South Group www.NorthSouthGroup.com

Creditor: Bank of Rockville Account No.: 123-456-789

Amount Due: \$2,284.56 as of 3/31/19

Telephone: (866) 555-1413

North South Group P.O. Box 123456

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Please detach at perforation and return with your payment.

YOUR DELINQUENT ACOUNT HAS BEEN REFERRED TO THIS OFFICE FOR COLLECTION! Please remit payment in full of any undisputed amount, payable to Bank of Rockville, in the enclosed envelope.

Account Details

Current Balance \$2,284.56

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within the thirty day period that the debt, or any portion thereof, is disputed, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you the name and address of the original creditor, if different from the current creditor.

We want to help you resolve this account. If you wish to make payment arrangements, you can call our office 24 hours a day at (866) 555-1413 so we can assist you in resolving this matter. As of the date of this letter you owe the amount stated above. Because your account may accrue interest, late charges and other charges that may vary from day to day, the amount due on the day you pay may be greater. If you pay the amount above an adjustment may be necessary after we receive your check. If so, we will contact you. For further information about your balance please call your account representative.

This communication is from a debt collector. We are required to inform you that this is an attempt to collect a debt, and any information obtained will be used for this purpose.

Sincerely, John Doe (800) 123-4567, ext 454 North South Group P.O. Box 123456 Pasadena, CA 91111-1234

If you have a complaint about the way we are collecting this debt, you may write to our Contact Center, P.O. Box 123456, Pasadena, CA 91111-1234 or call us toll-free at (800) 123-4567 between 9:00 A.M. P.S.T. and 5:00 P.M. P.S.T Monday-Friday