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Sent via OVERNIGHT MAIL

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex)
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

**Re: Telemarketing Sales Rule – Debt Relief Amendment
Our File No.: 3872.3**

Dear Secretary:

On behalf of our client Quality Survey Services (“QSS”), this office requests pursuant to FTC Rule 4.9(c) that the information contained on the enclosed CDs be treated as confidential and not be publically accessible for the reasons outlined below.

On October 23, 2009, QSS submitted a public comment related to Notice of Proposed Rulemaking and Request for Public Comments (tracking number: 543670-00187). I have attached a copy of the comment submitted by QSS. The comment primarily outlined the results of a survey conducted by QSS of consumers who had participated in debt settlement programs offered by and/or serviced by certain members of The Association of Debt Settlement Companies. The comment also outlined the methodology of the survey. At the conclusion of the comment, it encouraged the FTC to review the recorded calls in order to not just verify the data reflected in the surveys, but to hear the clients recite the experience they had while enrolled in the program.

Shortly after the submission of this comment, the undersigned received a telephone call from Evan Zullow of the FTC. Mr. Zullow indicated that the comment had been read and that the FTC would like to obtain copies of the recorded calls. During that conversation, the undersigned expressed a concern related to the confidential information that would be contained on the recorded consumer calls. Mr. Zullow suggested that the recorded calls could be submitted under the confidentiality provisions of FTC Rule 4.9(c).

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QSS requests that all recorded calls on the enclosed CDs be treated as confidential. These calls reflect *all* calls recorded by QSS. No call has been deleted. Further, there has been no editing of any call. Each call contains the name of the consumer. Each call inquiries about information related to aspects of the debt settlement programs they participated in. The responses may include the consumer naming specific credit card accounts (by name, not number) and amounts owed on specific accounts. Additionally, certain questions lead to open ended responses that often contain personal identifying information or personal financial information. This information should not be made public.

Given the nature of the content, it would be difficult and burdensome to review each call and delete confidential information. Further, such editing may erode the credibility of the calls, which QSS believes is essential.

The content of these calls validate the survey data that indicates that debt settlement provides an effective method for certain consumers to materially reduce their unsecured credit card indebtedness. As you will hear in some of these calls, the effect of the program can be dramatic and life changing.

If you require any additional information related to these recorded calls or the request for confidentiality. If this request is denied, please return the enclosed CDs.

Sincerely,

LOGAN RETOSKE, LLP

✓ **WILLIAM R. MITCHELL**
Attorney at Law

WRM/cm

Enclosure(s) as stated.

cc: Evan Zullo
Allison Brown
Wesley Young

Telemarketing Sales Rule – Debt Relief Amendments, R411001

William R. Mitchell
Logan Retoske, LLP
Attorneys for Quality Survey Services

Quality Survey Services (“QSS”) is an independent consumer research firm. QSS was retained by certain members of The Association of Settlement Companies (“TASC”) to conduct client exit interviews of consumers who (i) were enrolled in a debt settlement program, and (ii) had terminated the program before completion or had completed the program.

The members of TASC provided to QSS a list of all clients who have terminated or completed the program. The list contains the name, contact information and data related to the client. QSS called **each** client on the list and makes three telephone calls before it ceased efforts to reach a client.

QSS recorded all consented calls and archives all recorded calls. QSS interviews the client based on a questionnaire. During the call, the interviewer circles the answers and fills in the information provided by the client. QSS maintains all completed questionnaires.

QSS conducted 691 interviews and the results of these client exit interviews are outlined in the **TASC Exit Survey 2009**, attached hereto. The primary findings of the client exit interviews are as follows:

1. Seventy-six percent (76%) of all settled accounts experienced a reduction in the amount owed on the account of greater than forty percent (40%);
2. Ninety percent (90%) of the clients enrolled in a debt settlement program remained in the program for at least thirteen (13) months and twenty-eight percent (28%) remained in the program for more than thirty-six (36) months;
3. Eighty-eight percent (88%) of the clients were satisfied or very satisfied with the experience in the debt settlement program;
4. Eighty-two percent (82%) of the clients interviewed rated the experience as good or excellent; and
5. Ninety percent (90%) of the clients interviewed stated that they were glad they chose debt settlement as a method of getting out of debt.

QSS was retained by Nationwide Support Services, Inc. (“NWS”), a TASC member, to conduct exist interviews of consumers who were enrolled in a debt settlement program administered by NWS. The **NWS Surveys**, attached hereto, quantified the results of the participation in the program and the consumer’s satisfaction with the program.

QSS conducted a survey of 329 consumers enrolled in a NWS supported program following the completion of the program. The notable findings are:

- 91% of consumers remained in the program for more than one year;
- 83% of consumers settled their credit card accounts at a discount of at 40% or more of the outstanding balance;
- 78% of consumers rated their experience in the program as good or excellent; and
- 91% of consumers were “glad” they had chosen the debt settlement option.

QSS also conducted a survey of 129 consumers enrolled in a NWS supported program who had cancelled after completing 50% of the program. The survey states that the two primary reasons for cancellation were that the consumer could no longer afford the program (33%) or they decided to settle the accounts on their own (32%). Only 9% of the consumers stated that they cancelled due to dissatisfaction with the program.

QSS conducted a survey of 105 consumers enrolled in a NWS supported program eight months following completion. This survey was designed to track their use of credit following participation in the program, and found:

- Only 62% of those surveyed still use credits cards;
- 78% now have a savings or investment account; and
- Only 38% used a credit card for a major purchase.

These results highlight the effectiveness of the NWS debt settlement program’s financial literacy components.

QSS encourages the FTC to review the recorded calls in order to not just verify the data reflected in the surveys, but to hear the clients recite the experience they had while enrolled in the program.