

## **YGC Comment for FTC Debt Collection 2.0 Workshop**

This comment is submitted on behalf of YouveGotClaims (YGC). The Debt Collection 2.0 Workshop will be focusing on technology related to debt collection, and YGC is a major provider of such technology.

YGC is a cloud-based technology solution which has served the credit and collections industry for the past 11 years. This solution encompasses three technology services including an encrypted electronic data interchange (EDI), the most widely used and accepted data standard for translating data from geographically and technologically disparate sources (ETL), and data analysis and reporting tools (BI).

YGC transmits millions of records per day including new account placements to collection agencies and law firms from originators and current owners of consumer debts. In addition to the initial placements, YGC ensures accurate transmission of all subsequent collection activity including financial transactions, operational activities, and every telephone call or letter, all of which are mapped to a pre-determined set of YGC standard codes and tracked and stored in our repository. Through the YGC reporting suite, this micro level of data greatly enhances the audit and analytic capabilities of the debt owners and collection service providers.

YGC is used by a large number of collection agencies and collection law firms in the United States as well as a number of nationally chartered banks and some of the largest creditors and debt buyers in the country. This repository and pipeline represents the only one of its kind merging mass amounts of data from 600+ users within a standard format. YGC offers what we believe to be a level of auditing, process control and data integrity that cannot be matched by any other product in the market.

Our customers rely on our high levels of auditing, process control and data integrity to help ensure that best business and practice standards are maintained at all times throughout the collection process. Accuracy in the maintenance and transmission of collection data serves not only our clients but also the consumers whose accounts are being collected. YGC is leveraged as a monitor of procedures, and an audit mirror. It is used to minimize errors (whether data, procedural or human), to monitor all activity on every account, and to identify exceptions (situations that fail to adhere to defined standards) often BEFORE inappropriate actions are taken.

As an EDI conduit, YGC is like an electronic toll road. Use of our toll road helps ensure rapid, accurate and reliable transport of data. But, we do more. Because we operate a toll booth, we can control access. Imagine if FedEx could call the toll booth ahead of time and have their truck kept off the toll road if a headlight was broken or a tire was bald or low on air or if the driver was not wearing a seatbelt. If trucks were denied access to the toll road unless they met all applicable standards, that toll road would be the safest, most reliable of highways. That is what YGC does with data. If data is sent to us that is incomplete, corrupted, poorly formatted, or fails to adhere to standards set by the debt owner, YGC rejects it, thereby notifying the sender and simultaneously preventing contamination of other databases. In this way, YGC helps improve the integrity of the data it processes and the integrity and procedures of the participants on both ends.

The collection industry already uses YGC for such purposes and as an “early warning” monitor of all activity on an account. It does so because integrity and accuracy are of paramount importance both to the industry and to consumers. We respectfully submit that a tool such as ours is essential for the protection of consumers in the 21st century world of electronic account records.

YGC’s creditor and debt collector clients strongly support efforts to protect consumers from problems related to loss or lack of data integrity. We know this because those clients expend significant resources, some with us, in an ongoing effort to prevent mistakes, combat abuse and protect consumers. We will not suggest altruistic motives for those efforts. It is in our clients’ best interests to promote such consumer protections, both because burdening consumers into bankruptcy means that no one gets paid, and because that which harms the integrity of consumer data harms the enforceability of the debt.

It is easy to call for more regulation to protect data integrity; however, at a time when the government is struggling to keep its doors open and industry is already overburdened with new laws, bigger government is not the answer. YGC’s existing technology, already used by at least part of collection industry, can protect consumers from data-related issues without the need for additional governmental oversight. Consumer interests will best be served by employing such technology.