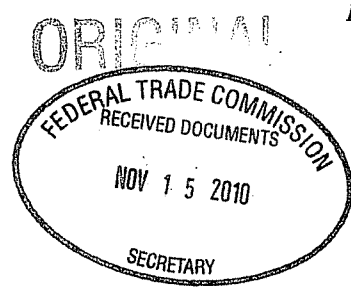


*Kelly Mack, President  
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**Executive Committee**

*President: Kelly Mack - Maryland  
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November 5, 2010



Federal Trade Commission  
 Office of the Secretary  
 Room H-135 (Annex W)  
 600 Pennsylvania Avenue  
 Washington DC 20580

RE: Deceased Debt Collection Policy Statement

Dear Sir/Madam:

The North American Collection Agency Regulatory Association (NACARA) has reviewed the referenced policy statement proposed on October 4, 2010 which clarifies the proper methods by which debts of deceased debtors should be conducted. NACARA is an organization of state officials and regulators responsible for enforcing state collection agency laws. We would like to comment in favor of this policy statement which certainly provides clear guidelines in the collecting of these sensitive financial obligations. We believe the three basic guidelines are tailored to effectively collect these types of debts and at same time protect the grieving parties from feeling obligated to personally settle the financial affairs of their deceased loved ones.

We are hopeful that the FTC and state regulators will aggressively police the new standards to ensure that collection letters and phone calls do not have the effect of pressuring relatives of the decedent to personally pay debts for which they are not legally liable.

NACARA was founded in 1994 and is dedicated to the better administration and enforcement of collection agency laws. The current membership consists of collection agency regulators from 25 states and Canada. NACARA holds an annual conference to discuss licensing matters, bonding issues, examinations, enforcement actions and consumer and creditor protection issues. We hear from members of the industry and consumer advocates and hold a roundtable discussion on topics of concern.

If you have questions about NACARA, please feel free to contact me directly at (410)230-6079 or via email at [kmack@dllr.state.md.us](mailto:kmack@dllr.state.md.us).

*Sincerely*

*Kelly Mack*  
 2010-2011 NACARA President  
 Maryland Commissioner of Financial Regulation