



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

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December 18, 2009

Jean Noonan
On behalf of ACCORD
Hudson Cook LLP
1020 19th Street, NW, 7th Floor
Washington, DC 20036

Dear Ms. Noonan:

Thank you for the public comment that ACCORD filed in the FTC's rulemaking proceeding regarding the Telemarketing Sales Rule - Debt Relief Amendments. We are seeking additional information to follow up on specific public comments, and we request that you voluntarily provide answers to the following questions.

Please let us know whether you will provide answers to the attached questions by Tuesday, January 5, 2010, and provide completed answers to all questions you are willing to answer by Tuesday, January 12, 2010.

All information should be submitted at <https://secure.commentworks.com/ftc-TSRDebtRelief> and will be treated as public comments in this proceeding. Comments containing material for which confidential treatment is requested must be filed in paper form, must be clearly labeled "Confidential," and must comply with FTC Rule 4.9(c), 16 CFR 4.9(c). Specifically, the comment must be accompanied by an explicit request for confidential treatment, including the factual and legal basis for the request, and must identify the specific portions of the comment to be withheld from the public record. The request will be granted or denied by the Commission's General Counsel, consistent with applicable law and the public interest. See FTC Rule 4.9(c), 16 CFR 4.9(c).

Please contact me if you have any questions.

Sincerely,

/s/ Allison Brown

Questions From FTC Staff Following Up on Public Comment

1. Number of accounts and consumers

For each question, state the specific time period.

- (a) How many total accounts have consumers enrolled with debt settlement companies that are members of ACCORD?
- (b) How much total debt have consumers enrolled with debt settlement companies that are members of ACCORD?
- (c) How much total debt have consumers settled through debt settlement companies that are members of ACCORD?
- (d) How many total consumers have enrolled with debt settlement companies that are members of ACCORD?

“Enrolled” is defined as consumers who have made at least one payment.

2. Debt reductions

- (a) For ACCORD members, what is the average percentage reduction of settled debt that consumers who completed the program received? Please calculate this percentage reduction using the amount owed at enrollment.

“Completed” is defined as having had 95%-100% of the consumer’s total amount of debt settled.

- (b) For ACCORD members, what is the average percentage reduction of settled debt that consumers who completed the program received? Please calculate this percentage reduction using the amount owed at settlement.

3. Accretion

For ACCORD members, what is the average rate of increase in amounts that consumers owe to creditors between enrollment and settlement?

4. Fee structure

- (a) What percentage of ACCORD members use a “back-end model” in which the consumer pays all of the fee upon program completion, paying a fee equal to a percentage of total savings?
- (b) Do any ACCORD members use fee models other than the “back-end model”? If so,

please explain for those fee models when amounts are collected, what amount is collected at each time, and how many members use the fee model.

(C) For consumers who have dropped out of ACCORD members' programs before completion, what is the total amount of fees paid by them?

5. Completion Rate

(a) Of consumers who enrolled in a ACCORD member program at least 36 months ago, what percentage have completed it? Please provide separate answers for each fee model.

(b) Of consumers who enrolled in a ACCORD member program at least 36 months ago, what percentage are still active? Please provide separate answers for each fee model.

6. Number of Settlements

(a) What percentage of consumers who enrolled in a ACCORD member program settled at least one debt in the first year after enrolling?

(b) What percentage of consumers in a ACCORD member program settled at least one debt in the first two years after enrolling?

(c) How many consumers who enrolled in a ACCORD member program dropped out before settling any debts?

7. ACCORD Membership

Please provide a list of ACCORD members and a brief description of their businesses.