



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

Allison I. Brown  
Attorney  
Division of Financial Practices

Direct Dial: 202-326-3079  
Fax : 202-326-3768  
E-mail: aibrown@ftc.gov

December 22, 2009

Michael Croxson  
CareOne Services, Inc.  
8930 Stanford Boulevard  
Columbia, MD 21045

Dear Mr. Croxson:

Thank you for the public comment you 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 provide completed answers to all questions you are willing to answer by Friday, January 15, 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

## **FTC Staff Questions in Response to Public Comment**

### **1. Number of Accounts and Consumers**

For each question, state the time period.

- (a) How many total accounts have consumers enrolled in DMPs with the company?
- (b) How much total debt have consumers enrolled in DMPs?
- (c) How much total debt have consumers extinguished through DMPs?
- (d) How many consumers participated in the 2009 pilot debt settlement program designed for consumers who did not qualify for a DMP and were not candidates for bankruptcy?
- (e) How is the pilot debt settlement program structured?

### **2. Debt Concessions**

- (a) For all consumers who complete DMPs, what is the average value of concessions that consumers receive?
- (b) For all consumers who enroll in DMPs, what is the average value of concessions that consumers receive?

### **3. Fee Structure**

- (a) What is the total fee that you charge to consumers for your services?
- (b) When do you charge the fee to consumers? If the fee is charged in parts over the course of a program, please explain when amounts are collected, including over how many months the fee is collected.
- (c) How much have consumers who have completed the program paid in fees in total?
- (d) How much have consumers who have dropped out of the program before completion paid in fees in total?
- (e) What percentage of consumers pay no fees because they do not have the ability to pay?
- (f) What is your definition of inability to pay?

### **4. Completion Rate**

- (a) Of clients who enrolled in the program at least 60 months ago, what percentage have completed it?

(b) Of clients who enrolled in the program at least 36 months ago, what percentage are still active?

(c) Of clients who enrolled in the program at least 60 months ago, what percentage are still active?

**5. Size of the Industry**

How many for-profit credit counseling agencies exist?