



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

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December 22, 2009

Rick Bialobrzeski  
Director of Government/External Relations and Communications  
GreenPath, Inc.  
38505 Country Club Drive, Suite 210  
Farmington Hills, MI 48331-3429

Dear Mr. Bialobrzeski:

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. Company Background**

- (a) How long have you been enrolling consumers in DMPs?
- (b) Have you made significant changes in your programs since you began offering DMPs?
- (c) What percentage of your clients enroll in DMPs versus obtain other products or services (e.g. counseling only, bankruptcy, etc.)?
- (d) Does your company offer any options allowing consumers to pay less than the full balance of their debts? If so, please describe.

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

For each question, state the time period.

- (a) How many total accounts have consumers enrolled in DMPs?  
“Enrolled” is defined as consumers who have made at least one payment.
- (b) How much total debt have consumers enrolled in DMPs?
- (c) How much total debt have consumers extinguished through DMPs?
- (d) How many total consumers have enrolled in DMPs with the company?

### **3. 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?

### **4. Fee Structure**

- (a) The comment states that most non-profit credit counseling companies charge a one-time set up fee of no more than \$50; in some states, and optional fee of up to \$50 for education, and a monthly fee, typically capped at \$50 (page 2). What is the total fee that your company charges 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?

**5. Completion Rate**

(a) Of clients who have been enrolled in the program for 60 months or longer, 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?