

**credit solutions**™*empowering debt-free living*

January 5, 2010

Allison I. Brown, Esq.  
Federal Trade Commission  
Division of Financial Practices  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

(Via Facsimile 202-326-3768)

**Re: Proposed Rulemaking to Amend the Telemarketing Sales Rule to Address the Sale of Debt Relief Services; Additional Information Requested for Specific Public Comments**

Dear Ms. Brown:

CSA – Credit Solutions of America, LLC (“CSA”) submits this letter in response to your letter to our counsel Andrew M. Smith with Morrison & Foerster, LLP dated December 18, 2009 pertaining to the above referenced matter.

We appreciate the willingness of the Federal Trade Commission (“FTC”) to consider additional information to substantiate our assertion that debt settlement is a valuable industry, which benefits consumers burdened by debt. We remain hopeful that, based upon the robust record already before it, the FTC will promulgate rules that protect individuals from bad actors, but do not stifle the industry as a whole.

Unfortunately, we will not be able to provide additional information directly to the FTC by January 12, 2010. We do intend to provide some data, but we will do so via a survey as requested by the trade group USOBA and its leadership. Please also be aware that we are currently working with several state attorneys general to produce data similar to what you have requested. We are spending a substantial amount of time and energy to gather this data for the states. Although the FTC’s inquiry is very important to us, these state deadlines relate in large part to ongoing litigation or inquiries and thus require our full and prompt attention.

We are also concerned, however, about whether our information will be treated confidentially if produced to the FTC. Portions of the data that you have requested are either confidential trade secret information or nonpublic personal information. Before voluntarily providing any information, we would need assurances from the FTC that our trade secrets and confidential customer information would not be publicly disclosed.

We appreciate your consideration in this matter and we look forward to working with you.

Very truly yours,



Lisa Washington-Watts  
Assistant General Counsel for CSA – Credit Solutions of America, LLC

cc: Andrew M. Smith, Esq.  
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