



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

February 1, 2013

The Honorable Richard Cordray  
Director  
Consumer Financial Protection Bureau  
1801 L Street NW  
Washington, DC 20036

Dear Mr. Cordray:

Thank you for your letter of December 11, 2012. As your letter mentions, the Consumer Financial Protection Bureau (CFPB) is responsible for providing annual reports to Congress concerning the federal government's efforts to implement the Fair Debt Collection Practices Act (FDCPA).<sup>1</sup> This letter describes the efforts the Federal Trade Commission (Commission or FTC) has taken during the past year in the debt collection arena. In the FTC's debt collection work, the CFPB has been a valuable partner, and the Commission anticipates that our partnership will become even stronger in the future. We hope that the information in this letter will assist the CFPB in preparing this year's report.

## **I. The Commission's Debt Collection Program**

The FTC's debt collection program is a three-pronged effort: (1) vigorous law enforcement; (2) education and public outreach; and (3) research and policy initiatives. Over the past year, the FTC has employed all three prongs in its effort to curtail illegal debt collection practices and protect consumers.

As described in detail below, last year, the Commission continued to engage in aggressive law enforcement activities to address troubling debt collection activity and obtained strong remedies to promote compliance with the law. The FTC educated consumers about their

---

<sup>1</sup> The Dodd-Frank Act directed the CFPB to report to Congress on the federal government's implementation and administration of the FDCPA. Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), Pub. L. 11-203, § 1089, 124 Stat. 1376, 2092-93 (2010) (amending the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692-1692p). Prior to the enactment of the Dodd-Frank Act, Section 815(a) of the FDCPA, 15 U.S.C. § 1692m, required the FTC to report directly to Congress on these topics. The Commission submitted such annual reports from 1977 to 2011. For the FTC's most recent annual report, see FEDERAL TRADE COMMISSION ANNUAL REPORT 2011: FAIR DEBT COLLECTION PRACTICES ACT, *available at* [www.ftc.gov/os/2011/03/110321fairdebtcollectreport.pdf](http://www.ftc.gov/os/2011/03/110321fairdebtcollectreport.pdf).

rights and businesses about their responsibilities under the FDCPA and the FTC Act. The FTC also consulted regularly with the public as part of the agency's debt collection outreach efforts. And the Commission engaged in research and policy development activities to identify, adopt, and advocate debt collection policies and practices that advance the agency's consumer protection mission.

## **II. Law Enforcement Activities**

The Commission is primarily a law enforcement agency, and law enforcement investigations and litigation are at the heart of the FTC's recent debt collection work. Both the FDCPA and the FTC Act authorize the Commission to investigate and take law enforcement action against debt collectors that violate those statutes.<sup>2</sup> If an FTC investigation reveals that a debt collector violated the law, the Commission may file a federal court action seeking injunctive relief under Section 13(b) of the FTC Act or refer the matter to the Department of Justice. Where a collector's violations are so egregious that a court order is necessary to halt the conduct immediately, or where consumer redress and disgorgement are more appropriate forms of monetary relief than civil penalties, the FTC generally files the action itself under Section 13(b) of the FTC Act. Where, on the other hand, preliminary injunctive relief to halt unlawful conduct is unnecessary and civil penalties are appropriate monetary relief, the FTC may refer the case to the Department of Justice.

In addition to filing and referring law enforcement actions, the FTC files amicus briefs and undertakes other law enforcement related activities.

### **A. Legal Actions**

In recent years, to improve deterrence, the Commission has focused on bringing a greater number of cases and obtaining stronger monetary and injunctive remedies against debt collectors that violate the law. Over the past year, the FTC has brought or resolved seven debt collection cases, matching the highest number of debt collection cases that it has brought or resolved in any single year. In each of its six Section 13(b) cases<sup>3</sup> involving debt collection, the FTC obtained preliminary or permanent injunctive relief. In many of these cases, the preliminary relief that was obtained included ex parte temporary restraining orders with asset freezes, immediate access to business premises, and appointment of receivers to run the debt collection business.

---

<sup>2</sup> The FDCPA authorizes the Commission to investigate and take law enforcement action against debt collectors that engage in unfair, deceptive, abusive, or other practices that violate the statute. Section 814 of the FDCPA, 15 U.S.C. § 1692l. Under the FTC Act, the FTC may investigate and take law enforcement action against entities that, in connection with collecting on debts, engage in unfair or deceptive acts and practices. Section 5 of the FTC Act, 15 U.S.C. § 45.

<sup>3</sup> The seventh case was a referral to the Department of Justice for civil penalties.

The cases discussed below represent a concerted effort by the FTC to target inappropriate debt collection practices including false threats, harassment or abuse, and attempts to collect on phantom payday loan debts.

## 1. **Deceptive, Unfair, and Abusive Collector Conduct**

Targeting debt collectors that engage in deceptive, unfair, or abusive conduct continues to be one of the Commission's highest priorities. In the past year, the Commission has filed or resolved four such actions. In *FTC v. Forensic Case Management Services, Inc.*, after over a year of litigation, the FTC has secured substantial monetary judgments against a debt collection enterprise and a complete ban on future debt collection activity, along with other injunctive relief.<sup>4</sup> The FTC's complaint alleged that the defendants violated the FTC Act and the FDCPA through such egregious conduct as threatening to physically harm consumers and desecrate the bodies of their dead relatives; threatening to kill consumers' pets; using obscene and profane language; revealing consumers' debts to third parties; and falsely threatening consumers with lawsuits, arrest, and wage garnishment. The FTC entered into settlements with six individuals and three corporations responsible for the enterprise, as well as three relief defendants, for judgments totaling over \$35.5 million.<sup>5</sup> The judgments were partially suspended based on the defendants' inability to pay, although the FTC will collect more than \$1.1 million for consumer redress or disgorgement.

In *United States v. Luebke Baker*, the Commission obtained a settlement with a debt collector that allegedly sought to recover on bogus magazine subscription debts that it purchased from others.<sup>6</sup> The defendants repeatedly told consumers that these debts were valid even though the seller had provided the defendants with information indicating that some of them were not. The complaint also alleged that the defendants masked their identities over caller ID, falsely told consumers that magazine debts are exempt from statutes of limitations, and threatened to garnish wages and take other unintended legal actions. The settlement imposed a monetary judgment totaling \$3.1 million, including \$2.3 million in civil penalties for violations of the FDCPA and \$730,000 in disgorgement for violations of the FTC Act. The judgments are suspended except for \$20,000, based on the defendants' inability to pay.

The FTC also brought actions against companies that use false threats to collect on payday loans. In *FTC v. Goldman Schwartz*, the Southern District of Texas entered a temporary restraining order with asset freeze against a debt collector that the FTC alleged violated the FTC

---

<sup>4</sup> Press Release, FTC Settlement Obtains Permanent Ban Against Abusive Debt Collection Operation (Jan. 17, 2013), *available at* <http://www.ftc.gov/opa/2013/01/rumson.shtm>.

<sup>5</sup> The Commission has moved for a default judgment against one minor relief defendant.

<sup>6</sup> *United States v. Luebke Baker & Associates, Inc.*, No. 1:12-cv-1145 (C.D. Ill. May 22, 2012) (stipulated final judgment and order); *see also* Press Release, Debt Collectors Settle with FTC, Agree to Stop Deceiving and Abusing Consumers (May 15, 2012), *available at* <http://www.ftc.gov/opa/2012/05/luebkenr.shtm>.

Act and the FDCPA by making false statements, including falsely threatening consumers with arrest; disclosing consumers' debts to third parties; collecting unauthorized fees; engaging in harassing and abusive conduct; failing to provide required notices; and making phone calls before 8:00am and after 9:00 pm.<sup>7</sup> Similarly, in *FTC v. AMG Services, Inc.*, the FTC alleged that a payday lender, collecting on its own behalf, violated the FTC Act by falsely threatening to take legal action against consumers.<sup>8</sup> The parties have stipulated to a preliminary injunction that prohibits the payday lender from making misrepresentations while collecting debts.<sup>9</sup> The Commission continues to litigate the *Goldman Schwartz* and *AMG Services* cases.

## 2. Phantom Debt Collection

One of the Commission's major consumer protection concerns is the rise of so-called "phantom debt collectors." Phantom debt collectors engage in unfair, deceptive, or abusive conduct by attempting to collect on debts (often related to payday loans) that either do not exist or are not owed to the phantom debt collector. In the past year, the Commission has filed or resolved three actions against phantom debt collectors.

On October 10, 2012, in *FTC v. American Credit Crunchers*, the federal court in the Northern District of Illinois entered a settlement agreement that includes a \$5.4 million judgment as part of a permanent injunction against the defendants for violations of the FTC Act and the FDCPA.<sup>10</sup> The judgment was partially suspended based on inability to pay, although the defendants were required to turn over assets worth approximately \$170,000. The complaint alleged that employees of the company pretended to be law enforcement or other government authorities, and falsely threatened to arrest and jail consumers immediately if they did not agree to make payment on purportedly delinquent payday loans.<sup>11</sup> The complaint charged that

---

<sup>7</sup> Complaint, *FTC v. Goldman Schwartz*, No. 4:13-cv-00106 (S.D. Tex. Jan. 31, 2013); *see also* Press Release, FTC Action Leads to Shutdown of Texas-based Debt Collector that Allegedly Used Deception, Insults, and False Threats Against Consumers (Jan. 31, 2013), *available at* <http://www.ftc.gov/opa/2013/01/goldman.shtm>.

<sup>8</sup> Complaint, *FTC v. AMG Services, Inc.*, No. 2:12-cv-536 (D. Nev. Apr. 2, 2012); *see also* Press Release, FTC Charges Payday Lending Scheme with Piling Inflated Fees on Borrowers and Making Unlawful Threats While Collecting (Apr. 2, 2012), *available at* <http://www.ftc.gov/opa/2012/04/amg.shtm>.

<sup>9</sup> *FTC v. AMG Services, Inc.*, No. 2:12-cv-536 (D. Nev. Dec. 27, 2012) (Order Entering Stipulated Preliminary Injunction and Bifurcation).

<sup>10</sup> *FTC v. American Credit Crunchers*, No. 12-CV-1028 (N.D. Ill. Oct. 10, 2012) (Stipulated Final Judgment and Order For Permanent Injunction); *see also* Press Release, U.S. Defendants Who Allegedly Abetted Fake Debt Collector Calls from India Agree to Settle FTC Charges (Oct. 23, 2012), *available at* <http://www.ftc.gov/opa/2012/10/americancredit.shtm>.

<sup>11</sup> Complaint, *FTC v. American Credit Crunchers*, No. 12-CV-1028 (N.D. Ill. Feb. 13, 2012); *see also* Press Release, Court Halts Alleged Fake Debt Collector Calls from India, Grants FTC

information consumers submitted in applying for payday loans online found its way into the defendants' hands. Even though consumers did not receive a payday loan from any lender that had retained the defendants to collect, defendants typically demanded more than \$300, and sometimes as much as \$2,000, from consumers. Many consumers believed these demands were legitimate because the defendants had their Social Security or bank account numbers from their payday loan applications.

In *FTC v. Pro Credit Group, LLC*, the FTC charged that several of the defendants, working closely with overseas call centers, engaged in a scheme to defraud consumers by processing payments for debts, including payday loans, that the consumers did not owe, or were never applied to the consumers' actual debts.<sup>12</sup> As in *American Credit Crunchers*, callers often claimed that they were law enforcement personnel and threatened consumers with arrest or other legal action. The United States District Court for the Middle District of Florida entered a preliminary injunction against the defendants and the litigation is ongoing.

Finally, in *FTC v. Broadway Global Master, Inc.*, the FTC charged the defendants with making more than 2.7 million phantom debt collection calls to at least 600,000 different phone numbers nationwide.<sup>13</sup> The FTC asserted that the defendants fraudulently collected more than \$5.2 million in less than two years from consumers, many of whom were strapped for cash and thought the money they were paying would be applied to loans they owed. The court granted a preliminary injunction with an asset freeze. The litigation is ongoing. In August 2012, in a parallel criminal proceeding, a federal grand jury charged the owner of Broadway Global with 21 criminal counts of wire and mail fraud for his phantom debt collection scheme.<sup>14</sup>

---

Request to Stop Defendants Who Often Posed as Law Enforcement (Feb. 21, 2012), *available at* <http://www.ftc.gov/opa/2012/02/acc.shtm>.

<sup>12</sup> Complaint, *FTC v. Pro Credit Group, LLC, et al.*, No. 12-CV-00586 (M.D. Fla. Mar. 19, 2012).

<sup>13</sup> Complaint, *FTC v. Broadway Global Master, Inc.*, No. 2:12-cv-855 (E.D. Cal. Apr. 3, 2012); *see also* Press Release, Court Halts Fake Debt Collector Calls from India, Grants FTC Request to Stop Defendants Who Posed as Law Enforcers (Apr. 11, 2012), *available at* <http://www.ftc.gov/opa/2012/04/broadway.shtm>.

<sup>14</sup> U.S. Dep't of Justice, Press Release, Tracy Man Indicted for Phony Debt Collection Scam (Aug. 23, 2012), *available at* <http://www.justice.gov/usao/cae/news/docs/2012/08-2012/08-23-12Patel.html>.

## **B. Other Law Enforcement Activities**

### **1. Private Plaintiffs' Rights: Marx Amicus Brief**

In August 2012, the Commission joined the CFPB and the Department of Justice in filing an amicus brief in the Supreme Court urging the Court to rule that private plaintiffs who file good-faith lawsuits against debt collectors for alleged violations of the FDCPA are not required to pay prevailing defendants' litigation costs.<sup>15</sup> In the underlying case, a consumer, Olivea Marx, sued a debt collector that had contacted her employer to obtain information about her employment status. Marx believed that the debt collector's conduct had violated the FDCPA, but she lost the case. The United States Court of Appeals for the Tenth Circuit ruled that Marx was responsible for paying more than \$4,500 to cover the debt collector's litigation costs, even though she had brought the case in good faith.

The federal government's amicus brief argues that the Tenth Circuit's decision was inconsistent with the FDCPA, which states that if a court finds that an FDCPA action "was brought in bad faith and for the purpose of harassment, [it] may award to the defendant attorney's fees reasonable in relation to the work expended and costs." The federal government also argues that limiting the imposition of litigation costs to consumers acting in bad faith or for harassment advances Congress' intent to deter unlawful debt collection practices through good faith private FDCPA actions. In contrast, the Tenth Circuit's ruling would create a disincentive to the prosecution of private enforcement actions.

The Supreme Court heard oral argument on the matter on November 7, 2012.

### **2. Time-Barred Debt: RJM Acquisitions Closing Letter**

An ongoing issue in the debt collection industry is what debt collectors must tell consumers in connection with collecting on debt that are beyond the relevant statute of limitations, also known as time-barred debt.<sup>16</sup> In 2011, the defendant agreed to settle *United States v. Asset Acceptance, LLC*, in which the Commission alleged that, in attempting to collect on debts that it knew or should have known were time-barred, Asset created the misleading impression that it could sue consumers if they did not pay.<sup>17</sup> The Commission alleged that

---

<sup>15</sup> See <http://www.ftc.gov/opa/2012/08/amicus.shtm>.

<sup>16</sup> See FTC, *Repairing a Broken System: Protecting Consumers in Debt Collection Litigation and Arbitration* at 25-28 (July 2010), available at <http://www.ftc.gov/os/2010/07/debtcollectionreport.pdf>.

<sup>17</sup> *United States v. Asset Acceptance, LLC*, No. 8:12-cv-182-T-27EAJ (M.D. Fla. Jan. 31, 2012) (court entered order); see also Press Release, Under FTC Settlement, Debt Buyer Agrees to Pay \$2.5 Million for Alleged Consumer Deception (Jan. 30, 2012), available at <http://www.ftc.gov/opa/2012/01/asset.shtm>.

Asset's failure to disclose to consumers that it could not legally sue consumers if they did not pay was a deceptive practice violating Section 5 of the FTC Act. To remedy the alleged violation, Asset agreed to a settlement requiring among other things that, for any debt that Asset knows or should know is time-barred, Asset disclose that it will not sue to collect on it.

In August 2012, the Commission's staff closed its investigation of RJM Acquisitions LLC ("RJM") for possible FDCPA violations concerning time-barred debt.<sup>18</sup> RJM is a debt buyer that attempts to collect on debts it purchases from original creditors, some of which are time-barred. The staff's closing letter explained that, even in the absence of any affirmative representations that consumers will be sued to collect time-barred debt, merely attempting to collect on such debt may lead consumers to believe that such suits may occur. Misleading consumers in this way would violate Section 5 of the FTC Act and Section 807 of the FDCPA. In its closing letter to RJM, FTC staff noted that RJM had added a disclosure to its collection letters to avoid consumers taking away the impression that they can be sued to collect on time-barred debt.

### **III. Education and Public Outreach**

The second prong of the FTC's FDCPA program is education and public outreach. Consumer education informs consumers of their rights under the FDCPA and what the statute requires of debt collectors. Business education informs debt collectors what they must do to comply with the law. The FTC also engages in public outreach to enhance legal service providers' understanding of debt collection issues.

The Commission educates consumers through English and Spanish written materials, one-on-one guidance, and speeches and presentations. In 2012, the Commission supplemented its distribution of this information by launching two consumer-oriented websites: [consumer.ftc.gov](http://consumer.ftc.gov) and [consumer.gov](http://consumer.gov). [consumer.ftc.gov](http://consumer.ftc.gov), which launched in December 2012, offers straightforward articles about a variety of consumer protection topics, as well as videos, educational games, and a blog that invites consumer comments.<sup>19</sup> The site addresses debt collection topics ranging from phantom debt collection<sup>20</sup> to time-barred debts.<sup>21</sup> [consumer.gov](http://consumer.gov), which launched in October 2012, is the product of extensive work in coordination with the Center for Applied Linguistics to write and design the site for audiences with low literacy levels. Features include short videos, infographics, and read-along audio. The site includes basic

---

<sup>18</sup> See <http://www.ftc.gov/os/closings/staff/120827rjmclosingletter.pdf>.

<sup>19</sup> *Welcome to the FTC's Home for Consumer Information* (Dec. 2012), available at [www.consumer.ftc.gov/blog/welcome-ftcs-home-consumer-information](http://www.consumer.ftc.gov/blog/welcome-ftcs-home-consumer-information).

<sup>20</sup> FTC, *Fake Debt Collectors* (Feb. 2012), available at [www.consumer.ftc.gov/articles/0258-fake-debt-collectors](http://www.consumer.ftc.gov/articles/0258-fake-debt-collectors).

<sup>21</sup> FTC, *Time-Barred Debts* (Jan. 2012), available at [www.consumer.ftc.gov/articles/0117-time-barred-debts](http://www.consumer.ftc.gov/articles/0117-time-barred-debts).

material on a variety of consumer protection topics, including a section about dealing with debt collectors. Material on both sites is available in English and Spanish.

The Commission educates industry by developing and distributing business education materials, delivering speeches, participating in panel discussions at industry conferences, and providing interviews to general media and trade publications. A complete list of the FTC's consumer and business education materials relating to debt collection and information on the extent of their distribution is set forth in Appendix A to this letter.

Finally, as part of the FTC's Legal Services Collaboration project, FTC staff regularly meets with legal services providers to discuss various consumer protection issues, including the FTC's work in the debt collection arena. In March 2012, FTC staff provided information about the agency's debt collection work in a webinar hosted by the National Association for Consumer Advocates. In October 2012, the FTC hosted legal service providers and other government agencies at a Washington, DC conference that had a strong focus on debt collection issues. The FTC also organizes "Common Ground" conferences that bring together legal services providers and law enforcement to discuss a wide variety of consumer protection issues, including debt collection. In 2012, Common Ground conferences were held in Phoenix, Concord (NH), Chicago, San Francisco, and Seattle.

#### **IV. Research and Policy Development Activities**

The third prong of the FTC's FDCPA program is research and policy initiatives. In the past year, the FTC has continued to monitor and evaluate the debt collection industry and its practices. Specifically, as described below, the FTC has examined the role of debt buying and new technologies in the debt collection industry.

##### **A. Debt Buyer Study**

Debt buying has become a significant part of the debt collection system over the past decade, and many debts are purchased and resold several times over a period of years before collection efforts finally cease. Some commentators have suggested that the age, amount, and quality of debt-related information that is sold results in debt collectors increasingly seeking to collect from the wrong consumer, in the wrong amount, or both. To empirically evaluate these information flow concerns and related issues, the Commission undertook a study of the debt buying industry. In December 2009, the FTC issued orders to nine of the nation's largest debt buying companies, requiring them to produce extensive and detailed information about their practices in buying and selling consumer debt.

On January 30, 2013, the FTC released its report on the debt buying industry. The report analyzed more than 5,000 portfolios of consumer debt containing nearly 90 million consumer accounts with a face value of \$143 billion. The report explained that debt buyers typically receive certain information from creditors at the time of purchase, but seldom receive certain key information and documentation about the debt, such as the dispute history or outstanding balances broken down by principal, interest, and fees. As the report indicates, there is room for improvement in the information these companies have when they contact consumers and try to



collect. As the Commission has noted previously,<sup>22</sup> the limited information that debt buyers receive may make it more likely that they will attempt to collect from the wrong consumer or the wrong amount.

The FTC study also estimated that consumers disputed 3.2% of the debts that debt buyers said they owed—at least one million disputed debts per year in the debt buyer industry. The Commission concluded that “the proper handling of this large number of disputed debts is a significant consumer protection concern.” In addition, the study revealed that debt buyers verified only half of the debts consumers disputed, and they were less likely to verify debts if they were older. The report cites the need for further research into issues relating to debt buying.

## **B. Debt Collection 2.0 Workshop**

In April 2011, the FTC convened industry representatives, consumer advocates, regulators, researchers and others to discuss debt collection technologies at a public workshop, *Debt Collection 2.0: Protecting Consumers as Technologies Change*.<sup>23</sup> Since the FDCPA was enacted in 1977, technologies for collecting and transmitting data, communicating, and making payments have advanced. Today’s collectors, for example, increasingly communicate with consumers via electronic mail, mobile phones, text messaging, and social media. In connection with these developments, workshop participants discussed the following topics: how debt collection technologies have evolved in recent years; whether such technologies can increase the likelihood collectors will contact the right consumer seeking the right amount; how to weigh the costs and benefits to consumers and collectors of employing newer technologies for information collection and storage, communication, and payment; and whether any legal or policy reforms might enhance consumer protection.

The insights gained through the workshop have been and will continue to be valuable in the FTC’s law enforcement investigations and litigation in the debt collection area. Further, over the past year, FTC staff has discussed its findings with CFPB staff working on debt collection issues. The Commission anticipates that these consultations will be instrumental in the CFPB’s ongoing and future efforts to administer and enforce the FDCPA and other laws implicated by debt collection technologies.

---

<sup>22</sup> *Federal Trade Commission Annual Report 2010: Fair Debt Collection Practices Act* at 17, available at <http://www.ftc.gov/os/2010/04/P104802fdcpa2010annrpt.pdf>; FTC, *Collecting Consumer Debts: The Challenges of Change* at iv-v; 21-24 (Feb. 2009), available at <http://www.ftc.gov/bcp/workshops/debtcollection/dcwr.pdf>.

<sup>23</sup> The final transcript of the workshop is available at [www.ftc.gov/bcp/workshops/debtcollectiontech/docs/transcript.pdf](http://www.ftc.gov/bcp/workshops/debtcollectiontech/docs/transcript.pdf).

## **V. Conclusion**

The Commission hopes that the information contained in this letter will assist the CFPB in its annual report to Congress about its administration of the FDCPA. The FTC looks forward to continuing to cooperate and coordinate with the CFPB on consumer protection issues relating to debt collection. If any other information would be useful or if you wish to request additional assistance, please contact Jessica Rich, Associate Director, Division of Financial Practices, at (202) 326-3224.

By direction of the Commission.

Donald S. Clark  
Secretary

**APPENDIX A:  
Debt Collection Educational Material Distribution in 2012<sup>24</sup>**

Consumer or Business Educational Material	Offline Distribution		Online Access	
	English	Spanish	English	Spanish
<b>Consumer Education: Brochures</b>				
Credit and Your Consumer Rights	58,100	7,200	35,741	3,221
Settling Your Credit Card Debts	44,200	6,900	2,689	2,954
Debt Collection FAQs: A Guide for Consumers	35,300	6,300	469,831	6,356
Knee-Deep in Debt	48,300	6,400	186,183	5,960
Debt Collection Arbitration: The Who, What, Why and How	25,800	N/A	13,245	N/A
<b>Consumer Education: Alerts (Online Only)</b>				
Paying the Debts of a Deceased Relative: Who is Responsible?	N/A	N/A	13,464	1,513
Ads Offering Debt Relief	N/A	N/A	3,845	1,026
Creditors Seeking Federal Benefits in Your Bank Account? Understanding Your Rights	N/A	N/A	14,525	N/A
Time-Barred Debts	N/A	N/A	79,650	3,003
Who's Calling? That Debt Collector Could Be a Fake	N/A	N/A	29,259	1,351
<b>Consumer Education: Video (Online Only)</b>				
Debt Collection, Animated	N/A	N/A	30,180	4,294
<b>Business Education: Brochures</b>				
The Fair Debt Collection Practices Act	N/A	N/A	310,127	N/A
<b>Business Education: Video (Online Only)</b>				
Debt Collection	N/A	N/A	4,588	N/A

<sup>24</sup> These numbers are current through September 2012. The online access numbers reflect access of materials from the FTC's website and other official sources. They do not include access to materials that are downloaded from FTC channels and reposted on outside websites.