

From: George Uberti
To: [DFPI Regulations](#)
Subject: PRO 2/20 Notice of proposed Rulemaking: debt collection regulation license application and requirements (section 1850.14)
Date: Sunday, April 25, 2021 12:39:07 PM

My name is George Uberti. I'm a California resident and consumer advocate. I thank the DFPI for the opportunity to comment on these regulations.

In regards to 1850.14 as it concerns the Commissioner's finding under section 1000.2(b)(7) of the California Financial Code determining that applicants will operate their debt collection businesses fairly, I respectfully request that the DFPI amend this section to specify that "any matter personal or professional" that may impact such a finding includes anti-trust considerations of marketshare and anticompetitive conduct. This section of the DFPI's proposed regulations is an opportunity to prevent enforcement redundancy between state and federal financial authority and streamline the regulatory framework of California's commercial debt collection market to the benefit of consumers. Ensuring that all parties involved in the regulation of the debt collection market from market participants to enforcement bodies include matters of market concentration and anticompetitive conduct as they are regulated by federal anti-trust laws in the concept of "fairness" in the conduct of business will ensure that these regulations achieve the most positive effect possible.

Thank you,
George Uberti