

**From:** Robert S. Lobel  
**To:** [DFPI Regulations](#)  
**Subject:** PRO 05-21 Comments  
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Sandra Sandoval -

I.C: The DCLA "debt collector" definition is far too broad. With the current definition, almost EVERY company with receivables would be considered a debt collector, including auto dealers and retailers. ideally, the term debt collector should mean a person collecting a debt which is distressed or delinquent at its onset.

I.F: Yes, the CLCA should list explicitly what licenses are needed to avoid the procurement of a debt collection license.

General: The requirement to show the debt collector's license number in every written and electronic correspondence with the debtor is onerous and impractical. For example, many companies are transitioning to SMS, where the number of characters is strictly limited to 160, leaving little room to display the license number.

General: Separate licenses for branch offices should NOT be required as these locations may have a very small number of employees, and the turnover rate can be high.

- Thanks for your consideration,

Rob Lobel, CPA, MBA  
President & CFO | A-L Financial Corp. | Est. 1977 | Celebrating our 44th Year!  
1551 N Tustin Ave Ste 400 | PO Box 11907

Tel: 714.479.1311 8:30a to 1:30p PT | Fax: 714.479.1323