

From: Courtney Reynaud
To: [DFPI Regulations](#)
Subject: PRO 05-21
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Questions:

1.C. – Is an attorney who receives an account for the purposes of litigation only and then the account, after judgement, is returned to the collection agency that is licensed, does that attorney need to be licensed? In this instance the attorney is not regularly attempting to collect a debt and does not engage in active collections. Please provide additional clarification on what “in the ordinary course of business” or “regularly” means?

3.A - \$25,000 bonds are already the highest of most states. Bond calculations are challenging and will increase costs both at the DFPI and on the agency side. I don't believe that the bond amount should be increased and am in fact hoping for these to be decreased.

I can't find a number for this request but it was mentioned yesterday on the call with the California Association of Collectors... Because of the pandemic, many companies were required to close their offices and/or limit staff in the office and as such, many had to transition to a fully and partially remote workforce. State regulators have all agreed that remote workers are not considered branch offices and we would like the DFPI to similarly address this issue.

Does the DFPI have plans for streamlining the notices that an agency is required to provide to consumers. Currently, we are providing the Rosenthal FDCPA language, California Consumer Privacy Act (CCPA), Credit Reporting safe harbor language and now new language related to DFPI rules. I believe some of the information is confusing and cumbersome and I hope that the DFPI can provide some streamlined safe harbor language for agencies.

Thank you for your review,

Courtney Reynaud