



## Debt Collection User Experience Study

February 2016



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## 1.0 Introduction

The Fair Debt Collection Practices Act (FDCPA), enacted in 1977, requires that debt collectors provide consumers with validation notices. These validation notices present consumers with, among other things, information about a given debt and the consumer's right to dispute that debt. The Consumer Financial Protection Bureau (CFPB) is currently working with Fors Marsh Group (FMG) to develop a model validation notice intended to clearly communicate key information about the debt and about how consumers can respond to the notice. To assess how different content, wording, and formatting could influence consumer perception and behavior, FMG conducted interviews with consumers as they reviewed a series of model validation notices.

FMG conducted 30 one-on-one interviews with consumers in two categories: (1) individuals with no debt collection experience and (2) individuals who had been contacted by a debt collector within the previous two years. Interviews took place at three locations: Arlington, Virginia, on March 31 and April 1, 2015; Minneapolis, Minnesota, on April 14 and 15, 2015; and Las Vegas, Nevada, on April 28 and 29, 2015. At the Arlington location, FMG interviewed 10 participants: eight with debt collection experience and two without. FMG interviewed nine participants at the Minneapolis location: seven with debt collection experience and two without. At the Las Vegas location, FMG interviewed 11 participants: eight with debt collection experience and three without.

Findings from an earlier cognitive testing phase informed the research team's decisions about the language and content of the notices tested during this user experience phase of the research. The goals of these interviews were to assess consumers' perceptions, preferences, and understanding of different model validation notices and to evaluate what influence, if any, these notices could have on consumers' behavior. During each interview, FMG researchers asked participants comprehension questions to determine their understanding of the notices and debriefing questions to establish their reactions to and perceptions of the notices.

During the user experience phase of the research, FMG also used eye-tracking glasses to capture participants' eye movements when reviewing the notice. Eye-movement data provide an additional level of insight into participants' experience with the notices. Eye movements consist of fixations, which occur when the eye is relatively still, and saccades, which are the rapid movements between the fixations. A fixation is very short, typically 0.1 to 0.5 seconds in duration. Heat maps and gaze plots were generated from participants' eye movements to determine how they allocated attention to the notice during the initial read-through. Heat maps show the relative proportion of fixations on the areas of the notice and provide insight into the areas that were fixated on the most. The areas with many fixations

are dark red and areas with fewer fixations are light green. Gaze plots show the order of fixations for each participant and provide insight into the visual scan path while participants are cognitively processing the notice's information. Any individual gaze plot is not representative of all participants, but illustrates one individual's order of fixations.

Four different versions of the notice were tested at each location. The documents went through an iterative design process in which the notices were revised after each round; consequently, the composition of the notices changed.

In Round 1, at the Arlington location, the first notice tested (the "Round 1 Basic Notice") contained information about the debt (e.g., account number, itemized amount owed, type of debt) and also referenced certain consumer rights (e.g., dispute right, cease communication right). The second notice (the "Alternative Cease Communication Notice") was identical to the Round 1 Basic Notice, except that it included a more detailed description of the cease communication right. The third notice was identical to the Round 1 Basic Notice, except it included a statement that the debt was time-barred but could be reported to credit reporting agencies. The fourth notice was the same as the third notice, except that it included a statement that the debt could be revived (i.e., the statute of limitations could restart) if the consumer acknowledged the debt in writing or made a payment toward the debt (the "revival disclosure").

In Round 2, at the Minneapolis location, the first notice tested (the "Round 2 Basic Notice") was substantively similar to the Round 1 Basic Notice, but was formatted differently. The second notice (the "Round 2 Alternative Dispute Language Notice") was identical to the Round 2 Basic Notice, except that it contained an alternative description of the consumer's dispute right. The third notice was identical to the Round 2 Basic Notice, except that it contained a time-barred debt notice and a statement that the debt could not appear on the consumer's credit report. The fourth notice was the same as the third notice except that it included a revival disclosure.

In Round 3, at the Las Vegas location, the first notice tested (the "Round 3 Basic Notice") was similar to the Round 2 Basic Notice. The second (the "Round 3 Alternative Dispute Language Notice") was identical to the Round 3 Basic Notice, except that it contained an alternative description of the consumer's dispute right. The third notice was similar to the Round 3 Basic Notice, except that it contained a time-barred debt notice, a revival disclosure, and a statement that the debt could be reported to a credit reporting agency. The fourth notice was the same as the third notice except that it stated that the debt generally could not appear on the consumer's credit report.

Copies of all of the notices tested can be found in Sections 15, 16, and 17 of this report.

## **2.0 General Perceptions**

### **2.1 Purpose of the notice**

The moderator began each session by having each participant review the basic form and then asking, “What is the purpose of the notice that you just viewed?” All participants understood that the notice was correspondence from a debt collector attempting to collect a debt. A participant from Round 1 said, “To inform you of the total amount of debt that you owe currently. A new company is taking over the debt so you now owe a debt collector.” A participant from Round 2 said, “[It] tells me that there is a debt that they’re collecting that’s attached to my name, and that there’s recourse I can take to stop the collection or get more information about the collection.” And a participant from Round 3 said, “To let me know that I owe money on a credit card, that the credit card hasn’t been paid, so they transferred it over to a debt collector, and now this is what it is.”

### **2.2 Important and helpful information**

The debriefing questions on the Basic Notice focused heavily on participants’ perceptions about the importance and helpfulness of information on the notice. During the debriefing interview, the moderator asked, “Is there anything in this information that catches your attention or which is particularly important to you?” When responding to this question, participants most often discussed the debt amounts and charges, dates of the charges and payment, and the parties involved in the collection process. For example, one participant from Round 1 responded to this question by saying, “I would say the amount that you owe now.” Another participant from Round 1 said, “Definitely the part on the left column when it has the breakdown of what I originally owed, the interest, and what I pay now.” Similarly, a participant from Round 2 said, “The amounts involved, the dollars owed.” Participants from Round 3 responded similarly. One said, “It’d be the dates. I’d also probably look at the amount. And also, real quick, anything that stands out that says options of what I could do at the moment.”

In Round 1, participants responding to this question also discussed the “Actions you can take” section. In Rounds 2 and 3, participants indicated they found the “How can I dispute the debt?” section as being helpful. However, these sections were mentioned less frequently than the three primary elements (debt amounts and charges, dates of the charges and payment, and the parties involved in the collection process). For example, a participant from Round 1 responded to the question by saying, “The actions I can take.” In Round 2, a participant said, “I think the biggest thing that catches my attention is the amount of debt you now owe and that price. I mean, it’s the different color, bold letters, so that part does stand out. And again right under that, the next thing that your eye catches is how you can dispute the debt.” Similarly, another participant in Round 2, who also mentioned the “How

“can I dispute the debt?” section, said, “And the stuff in bold [catches my attention] saying, you call and dispute, but if you do call, we may not be required to send you information that shows you the debt.” A Round 3 participant explained, “Well, the debt, for one thing, and then how to dispute over it is another. Call us or write them a letter.”

Participants responding to this question also discussed the tear-off at the bottom of the notice. One participant in Round 1 said, “The clip form is a very convenient way to respond to the notice. It’s easy.” A participant in Round 2 said, “Where to mail them and then—where to mail this bottom tear-off or cut-off sheet.” A few participants also mentioned the debt collector’s reference number when responding to this question and one participant mentioned that the CFPB website was most important.

The moderator also asked participants during the debriefing interview, “What is the most useful information to you in this notice?” Again, participants most frequently mentioned the amounts, dates, and parties involved. In Round 1, participants also discussed the “Actions you can take” section, and in Rounds 2 and 3, the “How can I dispute the debt?” section. In addition to these items, participants also mentioned—though less frequently—the collector’s phone number, information about the original creditor, the CFPB website, the tear-off, and the reference number. The following quotes provide examples of elements other than dates, amounts, and dispute/action items cited as useful on the notice:

- A participant in Round 1: “The ‘You Have Rights’ section. It’s the only thing that gives you an idea of what I could do to stop them or find out more. The rest of the letter just says that you owe a debt.” No other participants commented on the “You Have Rights” section when responding to this question.
- A participant in Round 1: “The [North South Group] website, my reference number, and the contact information for North South Group. I like [www.consumerfinance.gov](http://www.consumerfinance.gov).”
- A participant in Round 1: “The phone number and any info about the original creditor are the most valuable pieces of information.”
- A participant in Round 2: “The 800 number, because if I’m going to act on this, that’s the first thing I’m going to do.”
- A participant in Round 3: “The fact that there’s contact numbers, addresses, and the reference numbers and the original account number is actually on here for who your original creditor was.”

## 2.3 Overwhelming information

To evaluate whether the information in the validation notice was presented in a format that was understandable but not overwhelming, the moderator asked participants, “Did you feel overwhelmed by this notice at all? If yes, which parts, and why?” Across all three rounds, half of the participants responded that it was overwhelming and half said that it was not overwhelming. See Figure 1 for the complete distribution of responses.

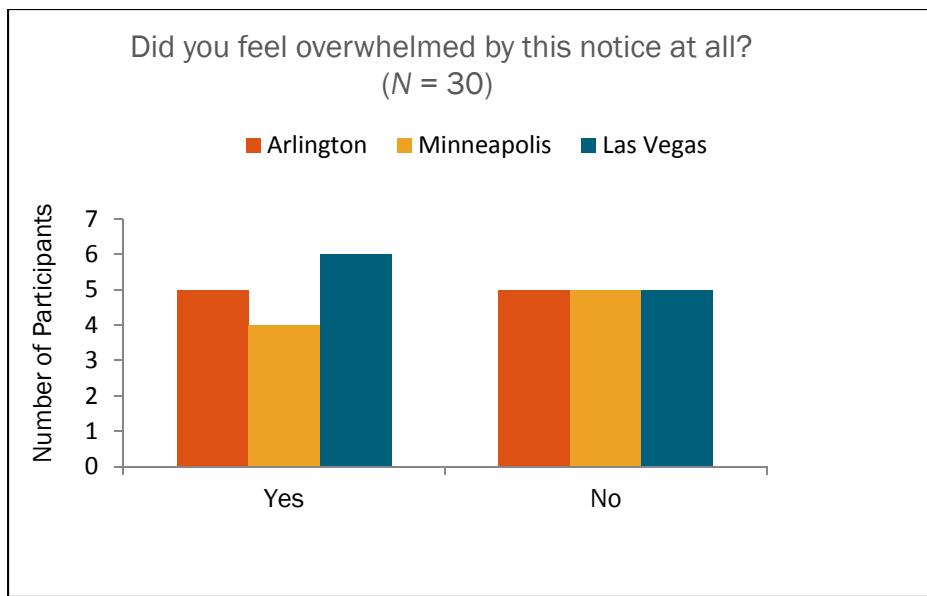


Figure 1.

Participants generally cited the overall process of debt collection to be the overwhelming aspect, not necessarily the notice itself. For example, one participant from Round 1 responded to the question by saying, “Yes, the amount of the debt, that there are some charges that I’m not aware of and that I don’t think that I made. Having to deal with what I’ll have to go through to solve this, I don’t have the patience for it.” Another participant said, “Well, I always feel overwhelmed if I get any kind of debt, especially if it’s over \$1,000.” Similarly, another participant said, “Well, I think they’re always stressful, getting a bill.”

Participants who identified specific pieces of information in the notice as overwhelming sometimes discussed the lack of more specific dates with regard to when different events within the debt collection process occurred. Some participants also mentioned the lack of specifics about the dates when the moderator asked, “What questions do you have after reading this [notice]?” One participant from Round 1, when asked if he/she felt overwhelmed by the notice, said, “A little, because it tells me that I owe a debt, but it doesn’t tell me how I can find out more about the debt. It doesn’t tell me when interest was added, and it doesn’t give you the date that the last payment was made.” A participant from Round 2, who also described the lack of dates and details about the debt as being overwhelming, said, “When was the interest charged? I do like to see stuff like that, when the charge was put on my account.” A participant from Round 3 also discussed the lack of dates as an item that he would have questions about after reading the notice. This participant said, “When did I pay the \$50? It looks like I got the dates that I owed.”

## 2.4 Eye Tracking of the Initial Read-Through

Analysis of the Round 1 heat map (see Figure 2) shows that three sections were fixated on the most: (1) the section that describes the consumer’s right to dispute the debt, (2) mini-Miranda, and (3) the section that displays the amount of debt. A higher number of total

fixations on a section of the notice could either indicate the information was confusing or important. We combine the eye-tracking data with participants' comments to arrive at the most plausible inference.

The fixation patterns that are observed in the eye-tracking visualizations are consistent with participants' comments. Participants commented that they considered all three of these highly fixated sections to be important. Participants' comments suggested that the mini-Miranda helped to orient participants to the purpose and content of the notice, and participants often commented that the information in the "Our information shows" section was the most important, followed by information in the debt dispute section.

The "You Have Rights" and "How do you want to respond to this notice?" sections had a comparatively low number of fixations compared to other parts of the notice. These two sections were often discussed during the interview as being important so the fewer number of fixations suggests that this information might have been easy to read and comprehend. Participants also commented that these sections only needed to be scanned, further suggesting that fewer fixations on this section might have been due to ease of processing the information rather than a disinterest in the information. Additionally, the lack of fixations on the tear-off suggests that its purpose was clear. Finally, the gaze plots from Round 1 demonstrate that most participants read the notice thoroughly; only two of the 10 participants quickly scanned the notice (see Figures 3 and 4).

## Round 1: Heat Map of Initial Read-Through

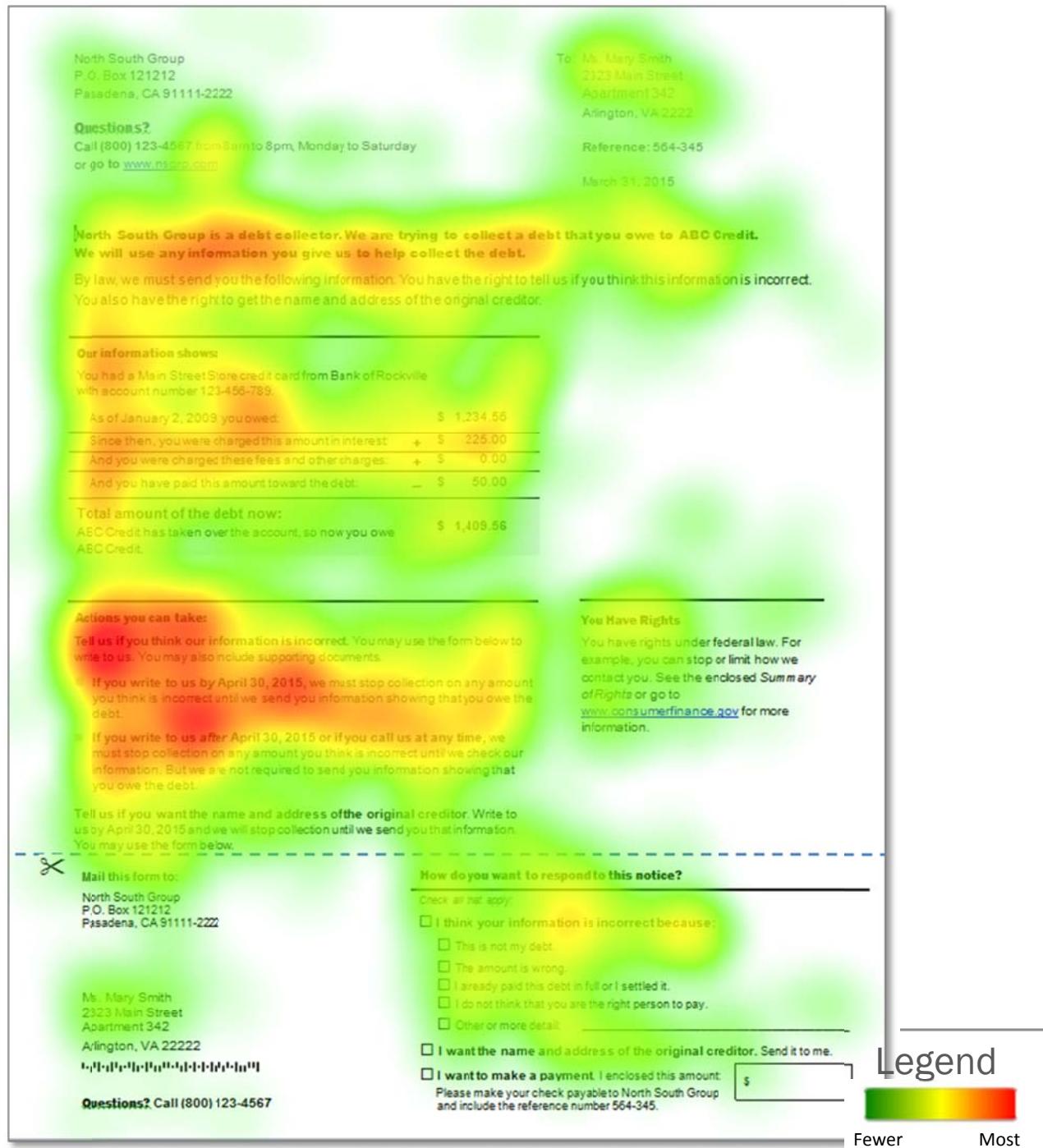


Figure 2. This heat map is a compilation of all eye fixations for all participants tested in Round 1 ( $n = 10$ ) that occurred during the participants' initial read-through of the notice.

## Round 1: Gaze Plot of Initial Read-Through

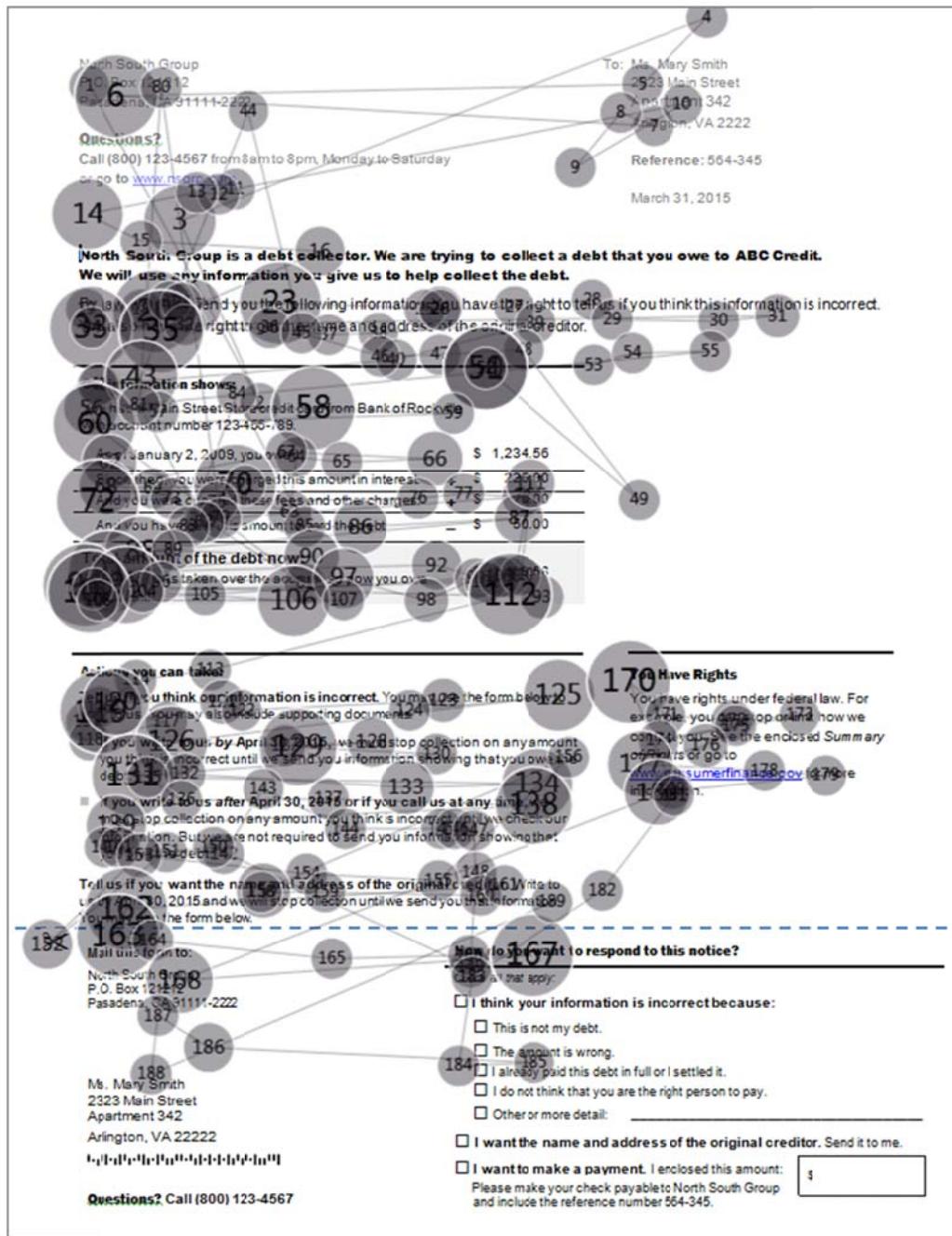


Figure 3. This gaze plot shows a participant who thoroughly read the notice during the initial read-through.

## Round 1: Gaze Plot of Initial Read-Through

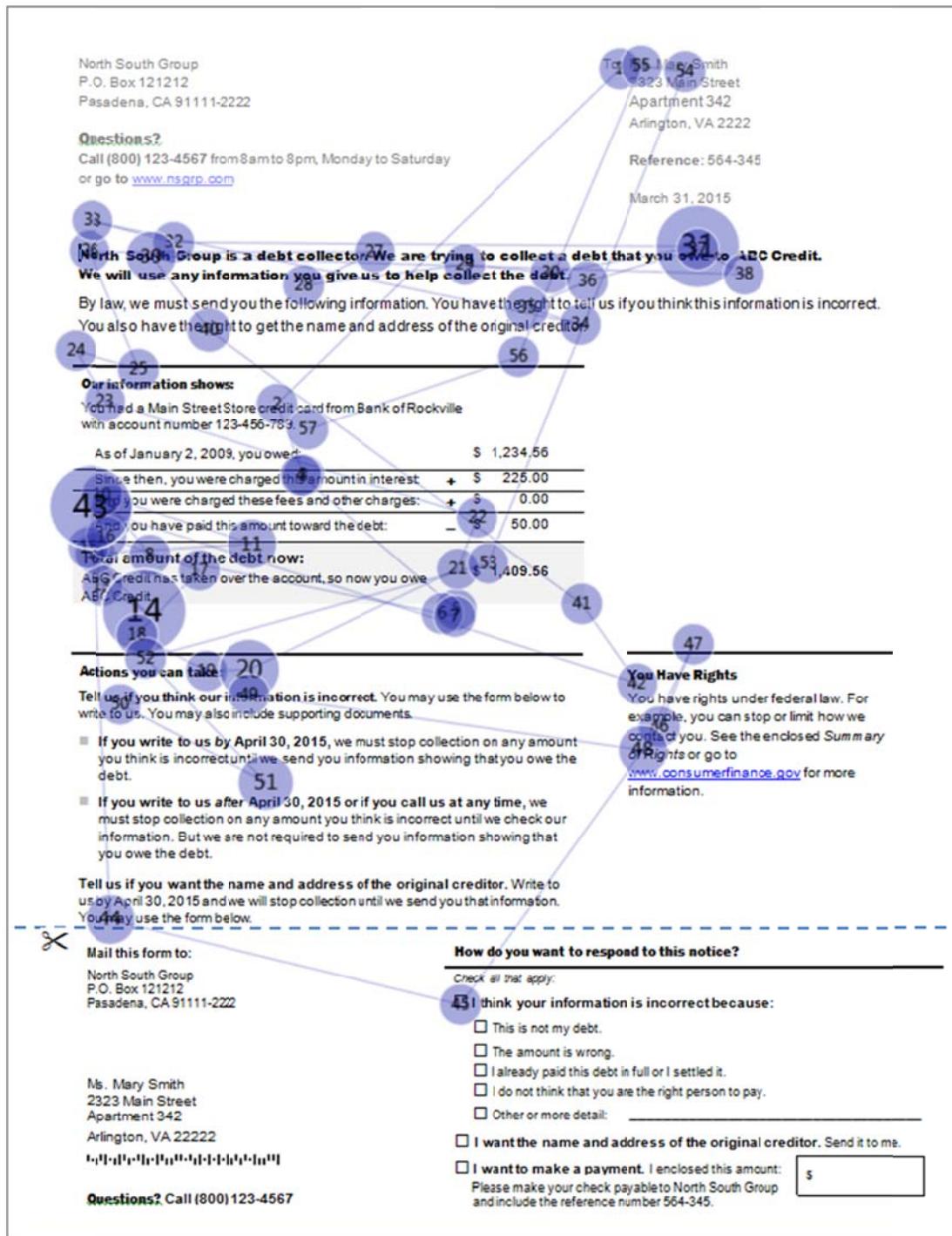


Figure 4. This gaze plot shows a participant who quickly scanned the notice during the initial read-through.

Consistent with Round 1 findings, the heat maps and gaze plots from Rounds 2 and 3 (see Figures 5–8) also show a high number of fixations occurring on the dispute section, as compared to other areas on the page. Participants also fixated on the mini-Miranda and the “Our information shows” box, while the “What else can you do?” section (i.e., request for name and address of the original creditor, learn more about your rights, and call us for payment options) was rarely fixated on during the initial read-through. The gaze plots show a similar visual scan pattern to Round 1. Participants typically read the opening section, moved to the “Our information shows” section, and then more thoroughly read the information advising them about how to dispute the debt. After reading about how to dispute, participants typically—and quickly—scanned the “How do you want to respond to this notice?” section.

## Round 2: Heat Map of Initial Read-Through

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

April 15, 2015

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$ 1,234.56
Between January 2, 2009 and today:	
You were charged this amount in interest:	+ \$ 225.00
You were charged this amount in fees:	+ \$ 0.00
You have paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,409.56

**How can you dispute the debt?**

Write to us by May 15, 2015 to dispute all or part of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.

Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.

Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).

Call us at (800) 123-4567 to talk about your payment options.

Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

How do you want to respond to this notice?

Check all that apply:

I want to dispute the debt because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_  
Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 5. This heat map is a compilation of all eye fixations for all participants tested in Round 2 ( $n = 8$ ) that occurred during the participants' initial read-through of the notice. Participants fixated the most on the dispute section.

## Round 2: Gaze Plot of Initial Read-Through

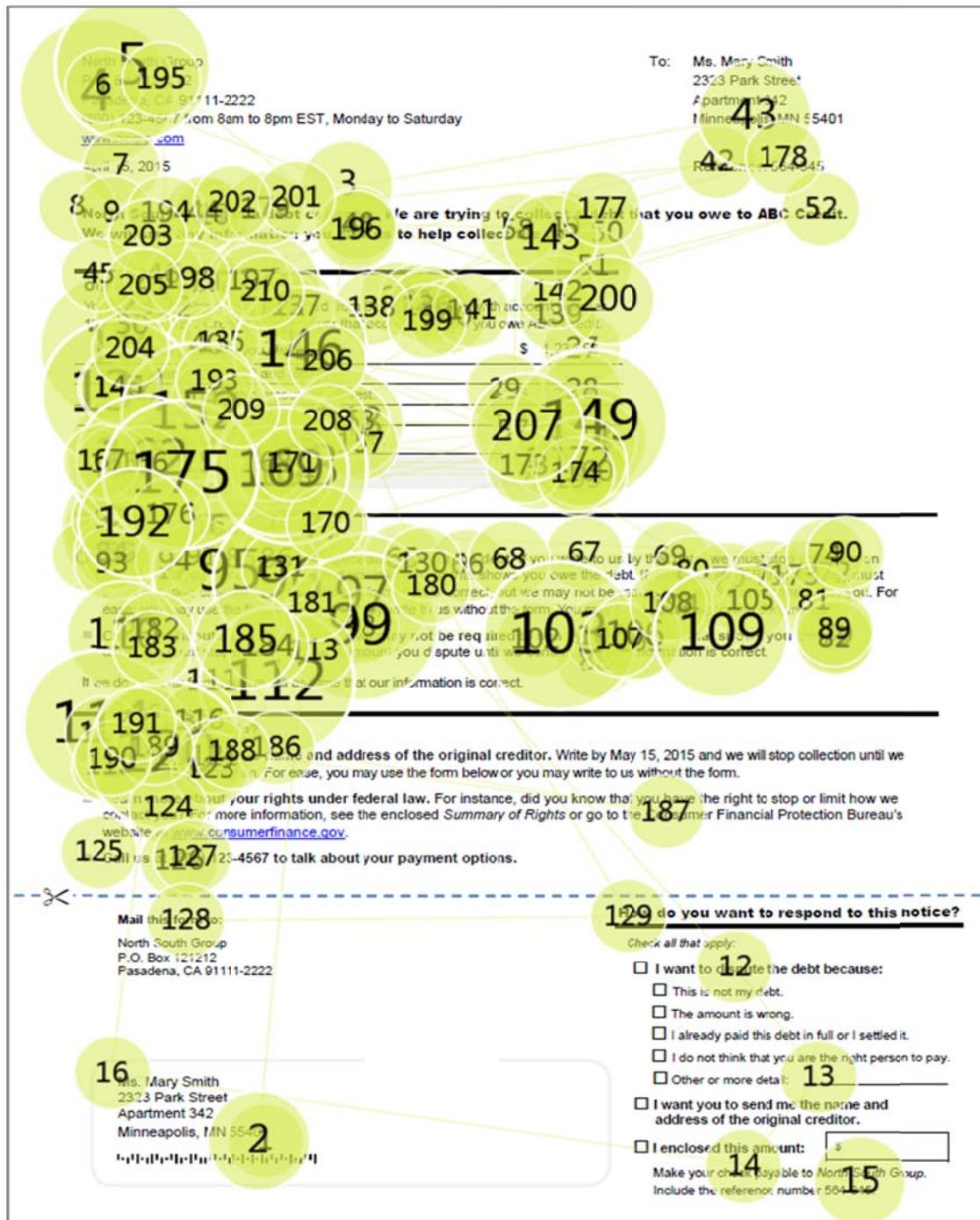


Figure 6. This gaze plot shows a Round 2 participant who thoroughly read the notice during the initial read-through. The participant: (1) oriented himself to the page by quickly scanning the notice, (2) more thoroughly scanned the introductory and debt information sections, and (3) read about how to dispute the debt.

## Round 3: Heat Map of Initial Read-Through

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 9am to 8pm EST, Monday to Saturday  
[www.nsgr.com](http://www.nsgr.com)

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

As of 5/27/2015  
Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

**Our information shows:**  
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today,	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,264.56

**How can you dispute the debt?**  
Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.

Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

**How do you want to respond to this notice?**

Check all that apply:

I want to dispute the debt because I think:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 You are not the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_  
Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 7. This heat map is a compilation of all fixations for all participants tested in Round 3 ( $n = 9$ ) during the initial read-through. Participants in this round also fixated the most on the dispute section.

### Round 3: Gaze Plot of Initial Read-Through

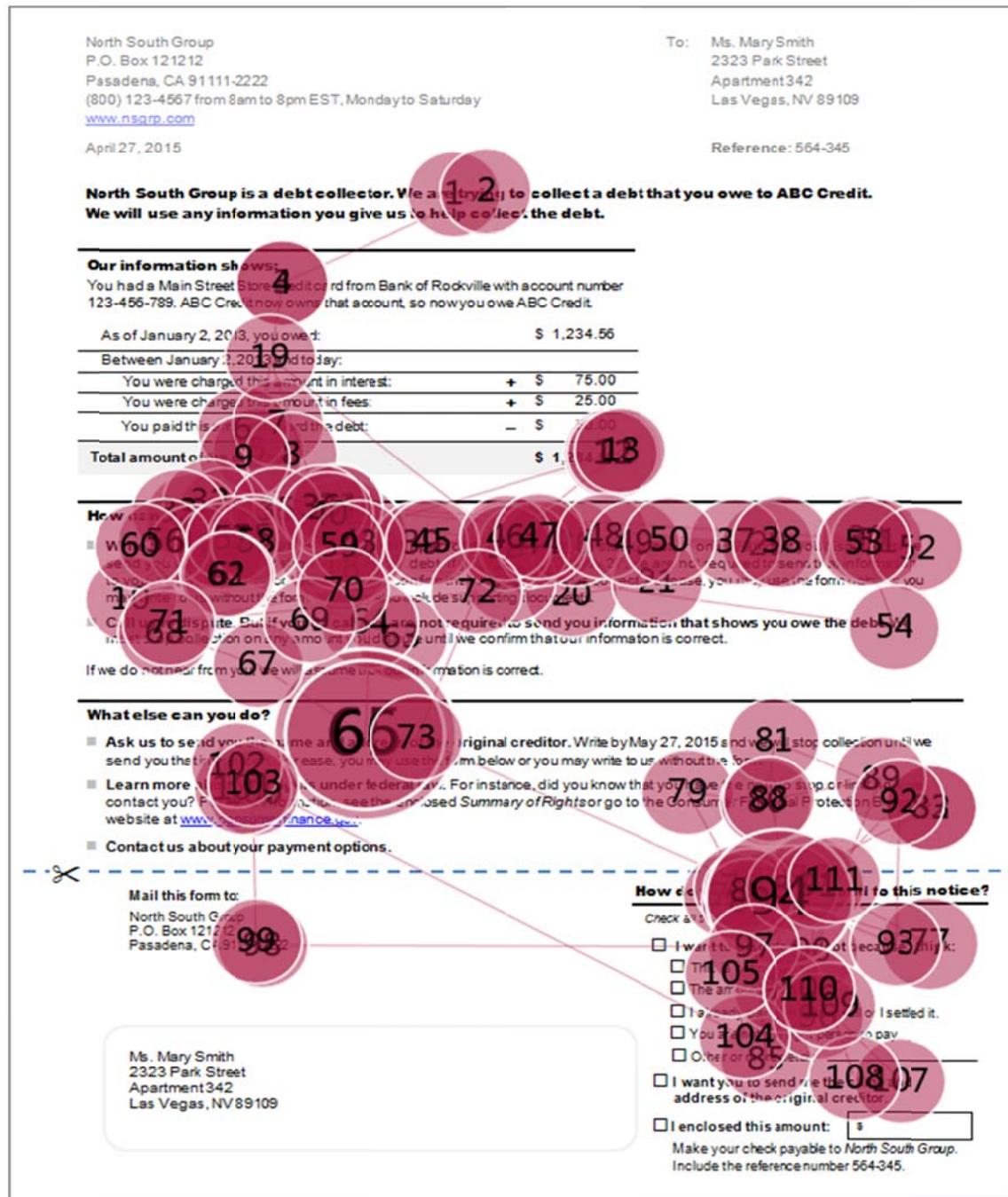


Figure 8. This gaze plot shows a Round 3 participant who: (1) quickly scanned the introductory and debt information sections, (2) read about how to dispute the debt, and (3) fixated on the information in the tear-off.

## 3.0 Introductory Language

In Round 1, the following sentences were included at the top of the notice, directly under the first bolded line of text:

“By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.”

The first round of testing suggested that these sentences did not generally aid in comprehension of the notice. With the exception of the first sentence—“[b]y law, we must send you the following information”—all of the information appeared in other sections of the form. The sentence “You have the right to tell us if you think this information is incorrect” might not have been necessary at the top of the notice, because participants’ comments suggested they knew they could take this action from the information in the “Actions you can take” section and on the tear-off at the bottom of the form (the tear-off will be discussed in more detail later in this report). The ability to request the name and address of the original creditor was also included on the tear-off and in the “Actions you can take” section. Eye-tracking visualizations showed that this section was rarely fixated upon despite being at the top of notice. Because of these multiple sources of evidence indicating that these sentences were not adding much value for participants, this introductory language was removed from the notices for Rounds 2 and 3.

## 4.0 Amount of the Debt

### 4.1 Changes to the form

All versions of the notices included a Debt Information Box, which contained basic information about the debt referenced on the notice, including amount owed, interest, and fees. Small changes were made to this box between rounds.

In Round 1, the sentence, “ABC Credit has taken over the account, so now you owe ABC Credit” was located at the bottom of the Debt Information Box. Comments from some participants suggested that they did not read or comprehend the information located below the “Total amount of the debt now” text. In Rounds 2 and 3, this sentence was moved to the top of the Debt Information Box so that it followed the sentence, “You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.” Participants

still verbally expressed some confusion over the chain of ownership (this is discussed in more detail in the next section), but their comments suggested that they were more likely to notice this sentence in the new location.

In Round 1, the notice stated: "As of January 2, 2009, you owed: \$1,234.56" (see Figure 9). The time period over which interest was charged was phrased as "Since then, you were charged this amount in interest." The lines that followed listed the fees charged and payments made over that time period. Those lines were indented the same distance as the amount initially owed. In Round 1, some participants had trouble determining when the interest and fees were charged, and when the payments were made. In Round 2, the language describing the time period was changed to "Between January 2, 2009, and today" and moved to a separate line (see Figure 10). Interest, fees, and payments were indented to indicate that they were nested within the charges that occurred since January 2, 2009.

### Debt Information Box Changes: Arlington (Round 1) to Minneapolis (Round 2)

#### Round 1: Debt Information

##### **Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

1

As of January 2, 2009, you owed: \$ 1,234.56

Since then, you were charged this amount in interest: + \$ 225.00

And you were charged these fees and other charges: + \$ 0.00

And you have paid this amount toward the debt: - \$ 50.00

##### **Total amount of the debt now:**

2

ABC Credit has taken over the account, so now you owe ABC Credit. \$ 1,409.56

Figure 9.

## Round 2: Debt Information

<b>Our information shows:</b>		
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.		
As of January 2, 2009, you owed:	\$	1,234.56
Between January 2, 2009 and today:		
You were charged this amount in interest:	+	\$ 225.00
You were charged this amount in fees:	+	\$ 0.00
You have paid this amount toward the debt:	-	\$ 50.00
<b>Total amount of the debt now:</b>	\$	<b>1,409.56</b>

Figure 10.

- 1     Added language, "Between January 2, 2009 and today:"
  - "Since then, you were charged this amount in interest" became "You were charged this amount in interest."
  - "And you were charged these fees . . ." became "You were charged this amount in fees:"
  - "And you have paid this amount . . ." became "You have paid this amount . . ."
  - Interest, fees, and debt were all indented.
- 2     Moved "ABC Credit has taken over that account, so now you owe ABC Credit."

Between Rounds 2 and 3, some additional minor changes were made to the Debt Information Box (see Figures 11 and 12).

## Debt Information Box Changes: Minneapolis (Round 2) to Las Vegas (Round 3)

### Round 2: Debt Information

<b>Our information shows:</b>		
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.		
As of January 2, 2009, you owed:	\$	1,234.56
Between January 2, 2009 and today:		
You were charged this amount in interest:	+	\$ 225.00
You were charged this amount in fees:	+	\$ 0.00
You have paid this amount toward the debt:	-	\$ 50.00
<b>Total amount of the debt now:</b>	\$	<b>1,409.56</b>

Figure 11.

### Round 3: Debt Information

<b>Our information shows:</b>		
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.		
As of January 2, 2013, you owed:	\$ 1,234.56	
Between January 2, 2013 and today:		
You were charged this amount in interest:	+ \$ 75.00	1
You were charged this amount in fees:	+ \$ 25.00	2
You paid this amount toward the debt:	- \$ 50.00	
<b>Total amount of the debt now:</b>	<b>\$ 1,284.56</b>	3

Figure 12.

- 1 Total amount of interest charged from \$225 to \$75 due to the date change that occurred between rounds.
- 2 \$25 in fees were added.
- 3 Total amount of debt owed changed from \$1,409.56 to \$1,284.56.

## 4.2 Comprehension and understanding

After inquiring about the purpose of the notice with participants, the moderator asked about the information found in the Debt Information Box. The first question the moderator asked was: “How much do you owe?” Across all rounds, all but one participant answered this question correctly.

The moderator then asked participants, “Does the amount you owe include any interest? If so, how much?” All participants in Rounds 1 and 2 answered this correctly. Only one participant in Round 3 indicated that a lower amount of interest was charged than stated on the notice. The moderator then asked participants: “Does the amount you owe include any fees? If so, how much?” Again, all participants in Rounds 1 and 2 answered correctly that no fees had been charged. In Round 3, two participants answered this incorrectly; one participant said \$50 was charged in fees and another said \$77 was charged in fees. In fact, the notice for Round 3 suggested that \$25 was charged in fees. Overall, nearly all participants answered these questions correctly, suggesting it was not difficult to find and identify the amounts listed in the Debt Information Box.

The moderator then asked participants, “Who charged the interest on this debt?” Across the three rounds, participants gave varying responses to this question. Ten participants stated that ABC Credit charged the interest; seven participants said they were unsure; six participants said it was North South Group; four participants said it was Bank of Rockville; and three participants said it was Main Street store. These results were expected because the form does not indicate which party charged the interest.

## 5.0 Creditor, Debt Collector, Brand, and Making Payments

The moderator asked participants questions about the chain of ownership of the debt, the relationship between the parties involved with the debt, and information specific to those parties. The first question was, “Who originally extended you the credit?” In Round 1, seven of the 10 participants correctly identified Bank of Rockville as the party that originally extended the credit. In Rounds 2 and 3, the responses were more varied. In Round 2, four out of nine participants correctly responded that the Bank of Rockville originally extended the credit. In Round 3, only three out of 11 participants correctly identified Bank of Rockville when responding to this question. In total, 14 of the 30 participants identified Bank of Rockville as the party that originally extended the credit. Of the participants who correctly identified Bank of Rockville, several participants first gave incorrect responses and then corrected their responses; other participants who correctly identified Bank of Rockville often hesitated when responding to this question. See Figure 13 for the full distribution of responses.

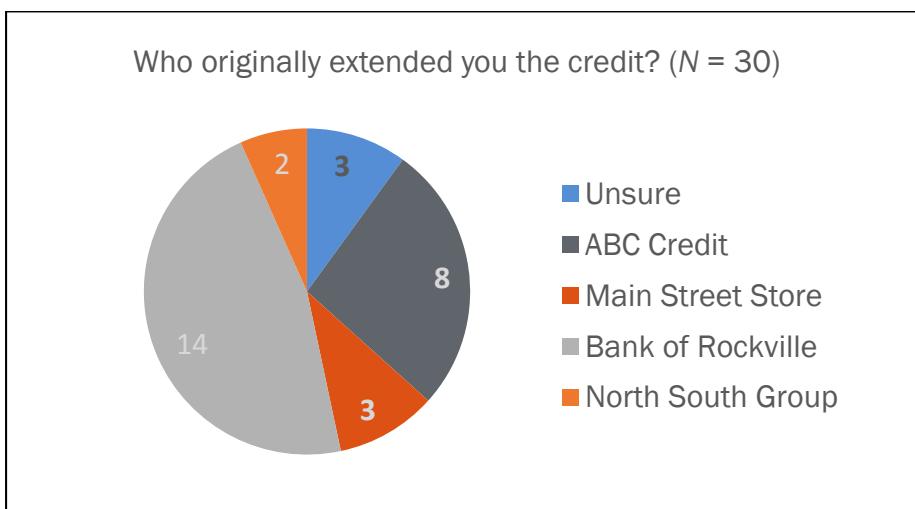


Figure 13.

The moderator followed this question by asking, “If you wanted their contact information, could you find it?” Twenty-three participants explained that they could contact North South Group for the contact information of the original creditor. Of those 23 participants, 11 mentioned that they could write or use the form to contact North South Group to obtain this information; nine only indicated that they could call the North South Group; and three only indicated that they could visit the North South Group’s website. One participant said that he would need to call the Main Street Store for their information, and four of the 30 participants said that the contact information for the original creditor could not be found on

the form. Responses suggested that different participants interpreted this question in different ways. Some participants appeared to have responded to this question as what they *would* do to obtain the original creditor's contact information, as distinguished from what the form explains one can do. Those participants who indicated that they could not find the information likely interpreted the question to be asking whether the contact information could be found on the form, not whether they could somehow obtain the contact information. Participants' responses suggested that they were aware that there are several methods for obtaining the original creditor's contact information and most recognized writing or using the form as one such method. See Figure 14 for the full distribution of responses.

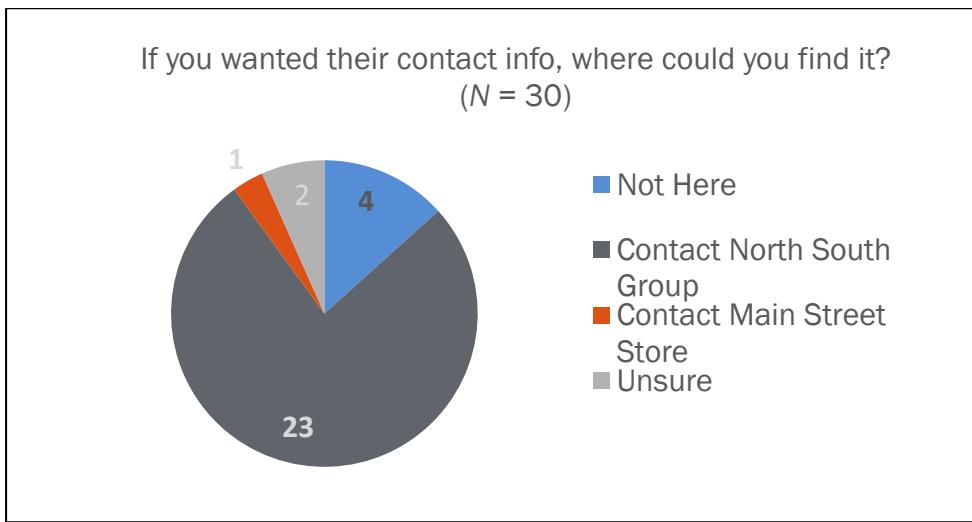


Figure 14.

Heat maps and gaze plots were generated from participants' eye movements to determine how attention was allocated to the notice after the moderator asked the question, "If you wanted the original creditor's contact information, could you find it?" Analysis of the Round 1 heat map shows that participants fixated on several areas on the notice when responding (see Figure 15). When asked if they could find the contact information, participants in Round 1 often fixated on the address in the top-right corner, the name of the debt collector in the top-left corner, the tear-off, and the account number. This suggests that participants had varying expectations about where to find the information necessary to obtain the original creditor's contact information. It also provides further evidence that participants misinterpreted the question to be asking whether the information could be found on the form itself, as they often looked at places where contact information is commonly located on a notice. Analysis of the gaze plots shows that when responding to this question, participants typically first fixated on the top of the form, which includes contact information for North South Group. Most participants then looked to the other areas of the form, which explained that they could write to North South Group for the original creditor's

contact information. Other participants simply explained that the contact information for the original creditor could not be found on the notice (see Figures 16 and 17).

Heat maps from Rounds 2 and 3 demonstrate that more fixations occurred on the “How can you dispute the debt?”, “What else can you do?”, and tear-off sections, relative to other areas on the notice (see Figures 18 and 20). Gaze plots further help visualize the clustering on these areas of the page (see Figures 19 and 21). This evidence suggests that the new header helped to orient participants to the information needed to obtain the original creditor’s contact information, which was referenced in the “What else can you do?” section and in the tear-off.

Round 1 Heat Map: “If you wanted the original creditor’s contact information, could you find it?”

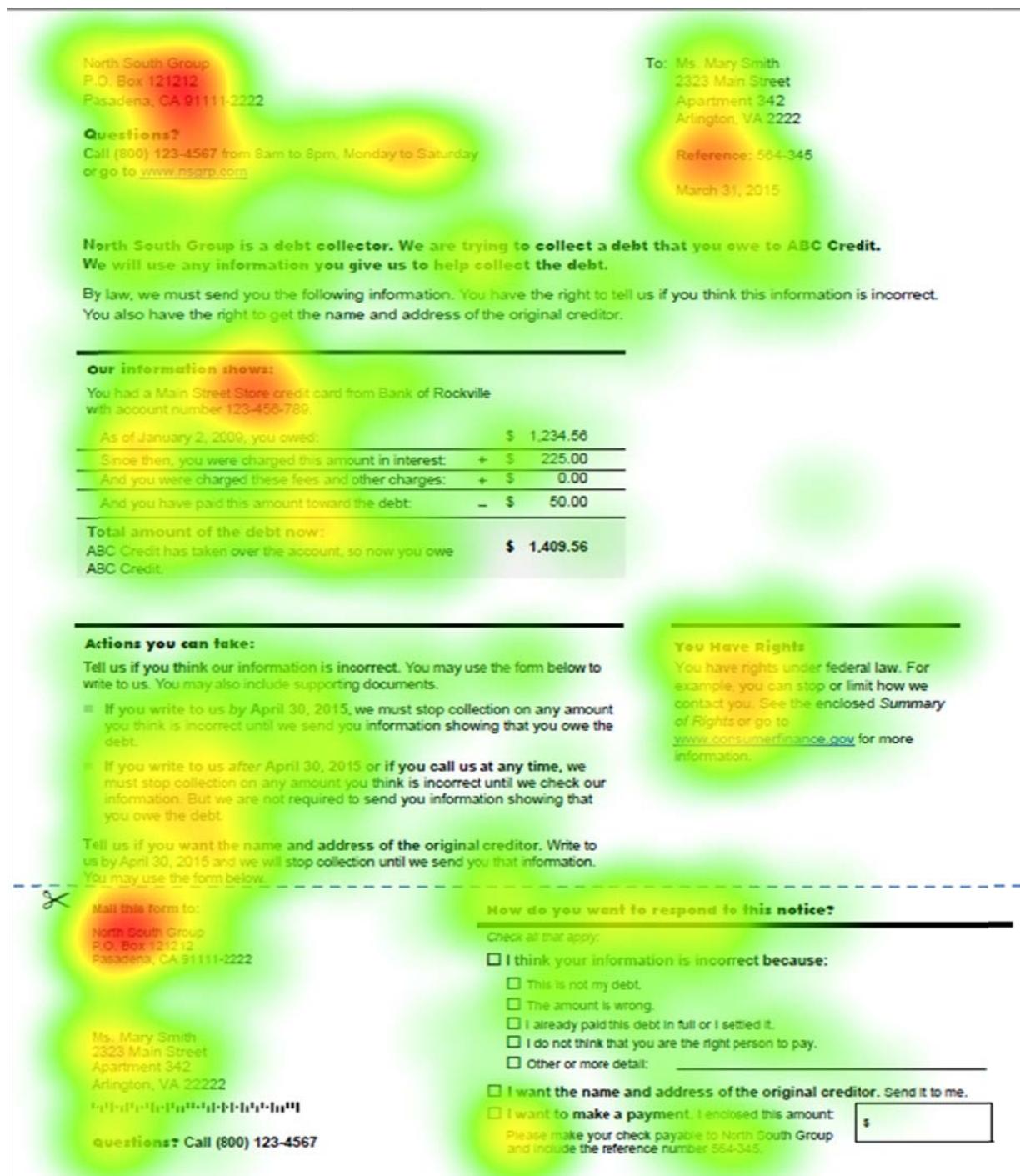


Figure 15. This heat map is a compilation of all eye fixations for all participants tested in Round 1 ( $n = 10$ ) that occurred after the moderator asked the question, “If you wanted the original creditor’s contact information, could you find it?”

Round 1 Gaze Plot: “If you wanted the original creditor’s contact information, could you find it?”

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Questions? Call (800) 123-4567 or go to 9 am to 8 pm, Monday to Saturday

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

Reference: 564-345  
March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

---

**our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2015, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>

ABC Credit has taken over the account, effective 3/31/2015.

---

**Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.

**Mail this form to:**

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

**15** Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions? Call (800) 123-4567**

---

**How do you want to respond to this notice?**

Check all that apply:

I think your information is incorrect because:

- This is not my debt.
- The amount is wrong.
- I already paid this debt in full or I settled it.
- I do not think that you are the right person to pay.
- Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:  
Please make your check payable to North South Group and include the reference number 564-345. \$ \_\_\_\_\_

Figure 16. This gaze plot is of a participant who briefly scanned the notice (less than seven seconds). This participant could not quickly find the answer, so he responded by saying, “Not on this sheet. No.” The gaze plot shows that the participant looked at several areas on the notice before giving up. This is further evidence that participants interpreted the question to be asking whether the contact information could be found on the form itself.

Round 1 Gaze Plot: "If you wanted the original creditor's contact information, could you find it?"

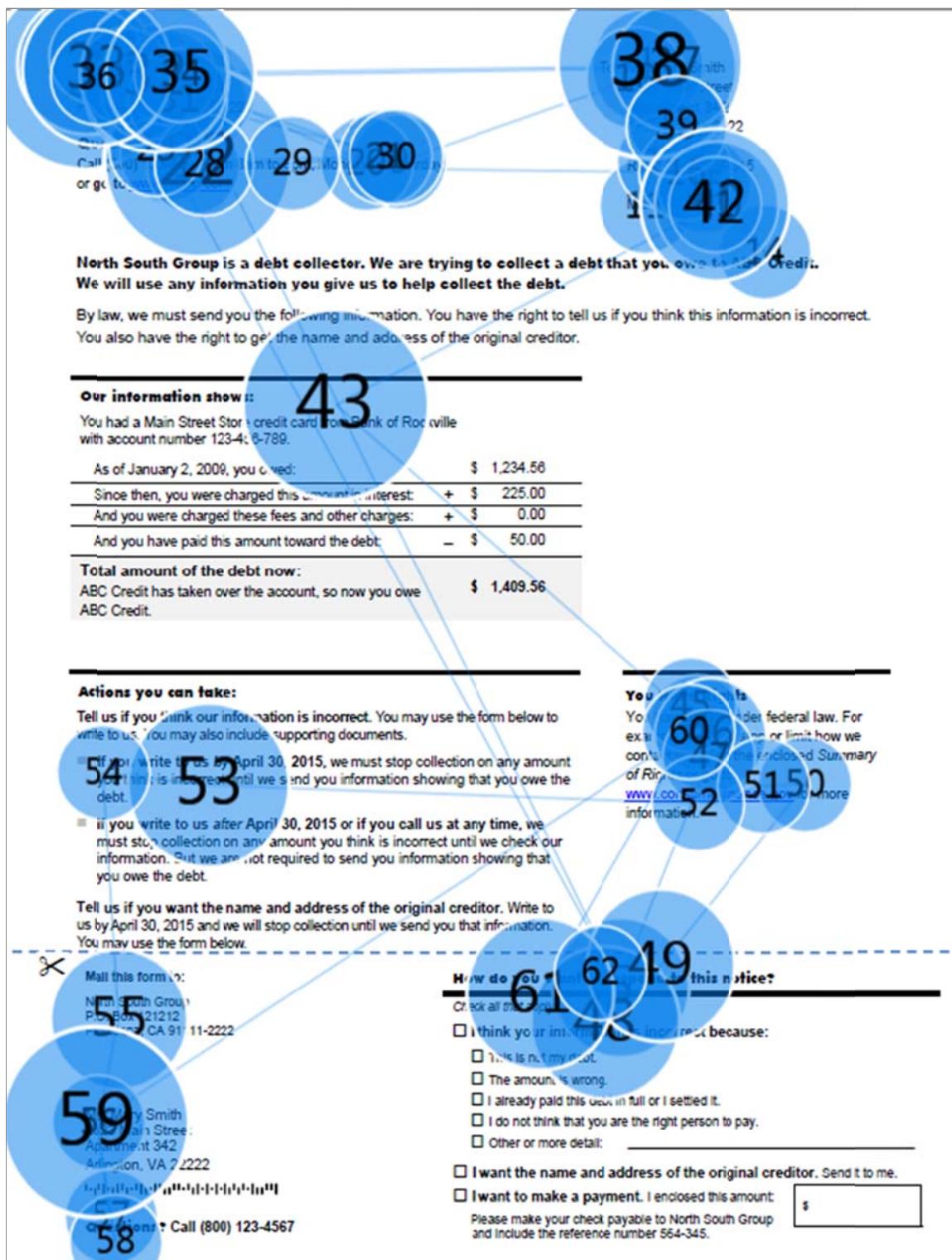


Figure 17. This gaze plot shows a participant who searched the notice longer (more than 25 seconds) before responding to the question.

Round 2 Heat Map: “If you wanted the original creditor’s contact information, could you find it?”

A heat map visualization showing participant eye fixations on a debt collection notice. The most intense fixations (red) are concentrated on the 'What else can you do?' section, particularly the instructions for disputing the debt. Other areas of significant fixation include the creditor's contact information at the top and the payment amount table.

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

April 15, 2015

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

---

**Our information shows:**  
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$ 1,234.56
Between January 2, 2009 and today:	
You were charged this amount in interest:	+ \$ 225.00
You were charged this amount in fees:	+ \$ 0.00
You have paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>

---

**How can you dispute the debt?**

Write to us by May 15, 2015 to dispute all or part of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.

- Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

---

**What else can you do?**

Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.

- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Call us at (800) 123-4567 to talk about your payment options.

Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

-----

**How do you want to respond to this notice?**

Check all that apply:

I want to dispute the debt because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 18. This heat map is a compilation of all eye fixations for those who participated in Round 2 ( $n = 6$ ) that occurred after the moderator asked the question, “If you wanted the original creditor’s contact information, could you find it?” In this round, participants fixated more on the “What else can you do?” section.

Round 2 Gaze Plot: “If you wanted the original creditor’s contact information, could you find it?”

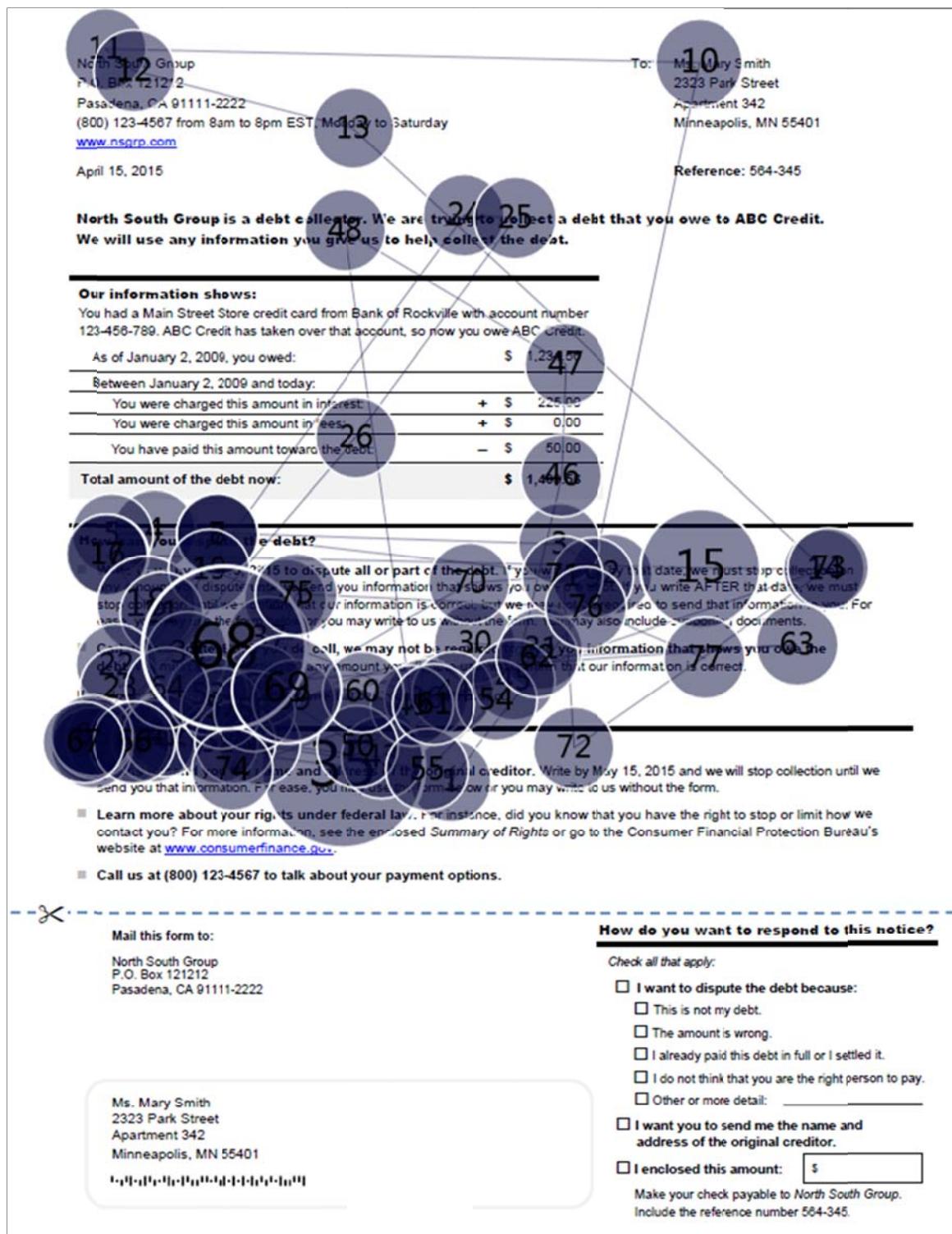


Figure 19. This gaze plot shows a participant who mostly fixated on the “How can you dispute the debt?” and “What else can you do?” sections.

Round 3 Heat Map: “If you wanted the original creditor’s contact information, could you find it?”

The image shows a heat map overlay on a debt collection notice. The heatmap uses a color gradient from green (low fixation) to red (high fixation). The highest concentrations of fixation are visible in the following areas:

- Header and Sender Information:** The top left contains the sender's address: "North South Group, P.O. Box 121212, Pasadena, CA 91111-2222, (800) 123-1561 from 9am to 8pm EST, Monday to Saturday, www.nsgrp.com". The top right lists the recipient: "To: Ms. Mary Smith, 2323 Park Street, Apartment 342, Las Vegas, NV 89109" and the reference number: "Reference: 564-345".
- Debt Summary Table:** A table showing the debt history and current balance. The table has four rows:

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00

**Total amount of the debt now:** \$ 1,284.56
- Dispute Instructions:** The section titled "How can you dispute the debt?" contains two bullet points:
  - Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
  - Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.
- Other Options:** The section "What else can you do?" contains three bullet points:
  - Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
  - Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
  - Contact us about your payment options.
- Response Options:** The section "How do you want to respond to this notice?" includes a list of checkboxes for dispute reasons and a box for enclosing a check:
  - I want to dispute the debt because I think:
    - This is not my debt.
    - The amount is wrong.
    - I already paid this debt in full or I settled it.
    - You are not the right person to pay.
    - Other or more detail: \_\_\_\_\_
  - I want you to send me the name and address of the original creditor.
  - I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group. Include the reference number 564-345.

Figure 20. This heat map is a compilation of all eye fixations for all participants tested in Round 3 ( $n = 8$ ) that occurred after the moderator asked the question, “If you wanted the original creditor’s contact information, could you find it?” In this round, participants fixated more on the “How can you dispute the debt?”, “What else can you do?”, and “How do you want to respond to this notice?” sections.

Round 3 Gaze Plot: "If you wanted the original creditor's contact information, could you find it?"

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 27, 2015

**1 3 5 2 4**  
North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit.  
We will use any information you give us to help collect the debt.

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	- \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	<b>19</b> \$ 1,284.56

**How can you dispute the debt?**

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**18**  
**What else can you do?**

- Ask us to send you the name and address of the original creditor. Within 30 days of May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

**22**  
**21**  
**17**  
**37**  
**23**  
**25**  
**36**  
**35**  
**11**  
**6**  
**29**  
**13**

**How do you want to respond to this notice?**

I enclose my check (if applicable).  
 I want you to send me the name and address of the original creditor.  
 I enclosed this amount:   
Make your check payable to North South Group.  
Include the reference number 564-345.

Mall this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Figure 21. This gaze plot shows a Round 3 participant who mostly fixated on the "How do you want to respond to this notice?" section.

The next question was designed to assess whether participants could locate the original account number associated with the debt. The moderator asked participants, “What is your account number with the company that lent you the money?” Twenty-eight of 30 participants correctly identified the account number 123-456-789, which was located in the Debt Information Box. Four of the 28 participants who identified the correct account number made comments that suggested that they at first did not see it. These participants’ comments suggest that they saw the reference number first, hesitated, and then found the account number. For example, a participant in Round 2 said, “I see a reference number. Oh, OK, I see it. It’s 123-456-789. The account number was with the store.” Similarly, a participant in Round 3 said, “There’s a reference number. It doesn’t really say that it’s that. Oh, wait. No, I’m sorry. It’s on there—123-456-789.” Two participants said there was not an account number or referred (incorrectly) to the reference number. See Figure 22 for the full distribution of responses.

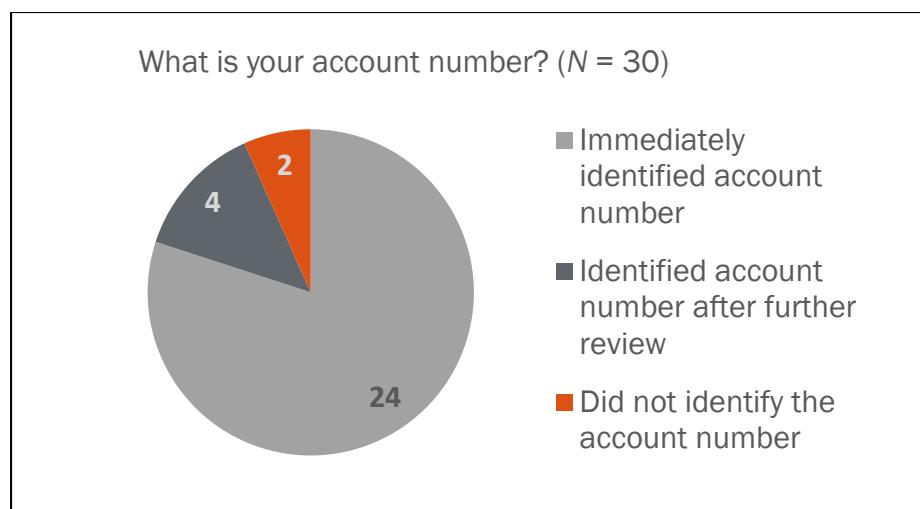


Figure 22.

Heat maps and gaze plots were generated from participants’ eye movements to determine how they allocated attention to the notice after the moderator asked this question. The heat map shows that participants primarily fixated on the account number (see Figures 23, 25, and 27). The gaze plots show that although participants fixated more on the account number when responding to this question, they typically first fixated on the top-right corner where the reference number was located (see Figures 24, 26, and 28). In summary, these visualizations suggest that most participants might expect to find the account number in the top-right corner, where the reference number is located; however, they were still able to find the account number quickly after scanning the notice. This finding is consistent across the three rounds.

Round 1 Heat Map: "What is your account number with the company that lent you the money?"

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions?**  
Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

Reference: 564-345  
March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

---

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00

**Total amount of the debt now:**  
ABC Credit has taken over the account, so now you owe \$ 1,409.56  
ABC Credit.

---

**Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.

**Mail this form to:**  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

**Ms. Mary Smith**  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions? Call (800) 123-4567**

---

**How do you want to respond to this notice?**

Check all that apply:

I think your information is incorrect because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:  
Please make your check payable to North South Group and include the reference number 564-345.

Figure 23. This heat map is a compilation of all eye fixations for all participants tested in Round 1 ( $n = 10$ ) that occurred after the moderator asked the question, "What is your account number with the company that lent you the money?" Participants fixated mostly on the account number when responding to this question.

Round 1 Gaze Plot: "What is your account number with the company that lent you the money?"

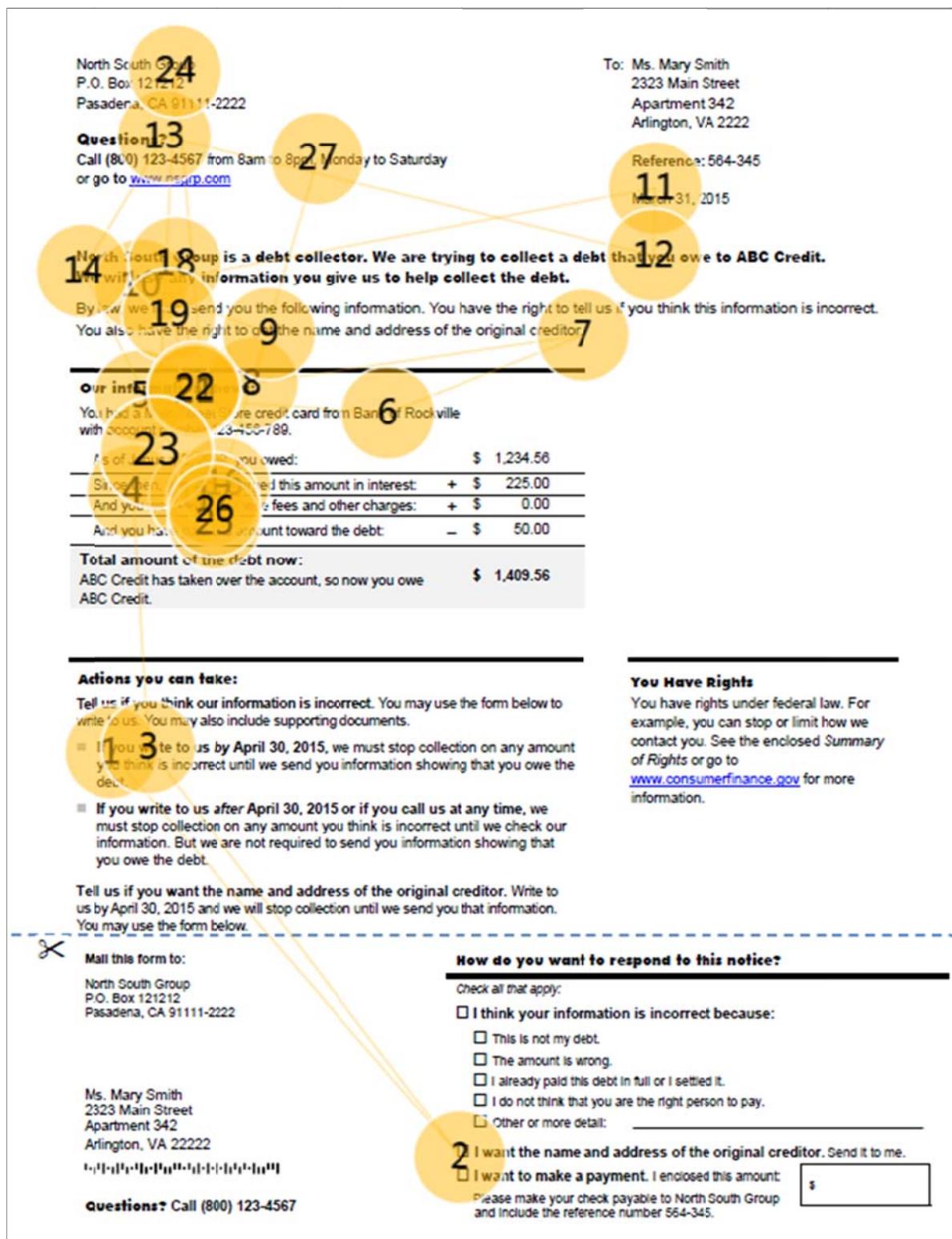


Figure 24. This gaze plot shows a participant who mostly fixated on the account number.

Round 2 Heat Map: “What is your account number with the company that lent you the money?”

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgr.com](http://www.nsgr.com)

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

April 15, 2015      Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

---

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$ 1,234.56
Between January 2, 2009 and today:	
You were charged this amount in interest:	+ \$ 225.00
You were charged this amount in fees:	+ \$ 0.00
You have paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>

---

**How can you dispute the debt?**

- Write to us by May 15, 2015 to dispute all or part of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

---

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Call us at (800) 123-4567 to talk about your payment options.

Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

How do you want to respond to this notice?

Check all that apply:

I want to dispute the debt because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 25. This heat map is a compilation of all eye fixations for all participants tested in Round 2 ( $n = 6$ ) that occurred after the moderator asked the question, “What is your account number with the company that lent you the money?” Participants fixated on the account number, as well as the top-right corner of the page, when responding to this question.

Round 2 Gaze Plot: "What is your account number with the company that lent you the money?"

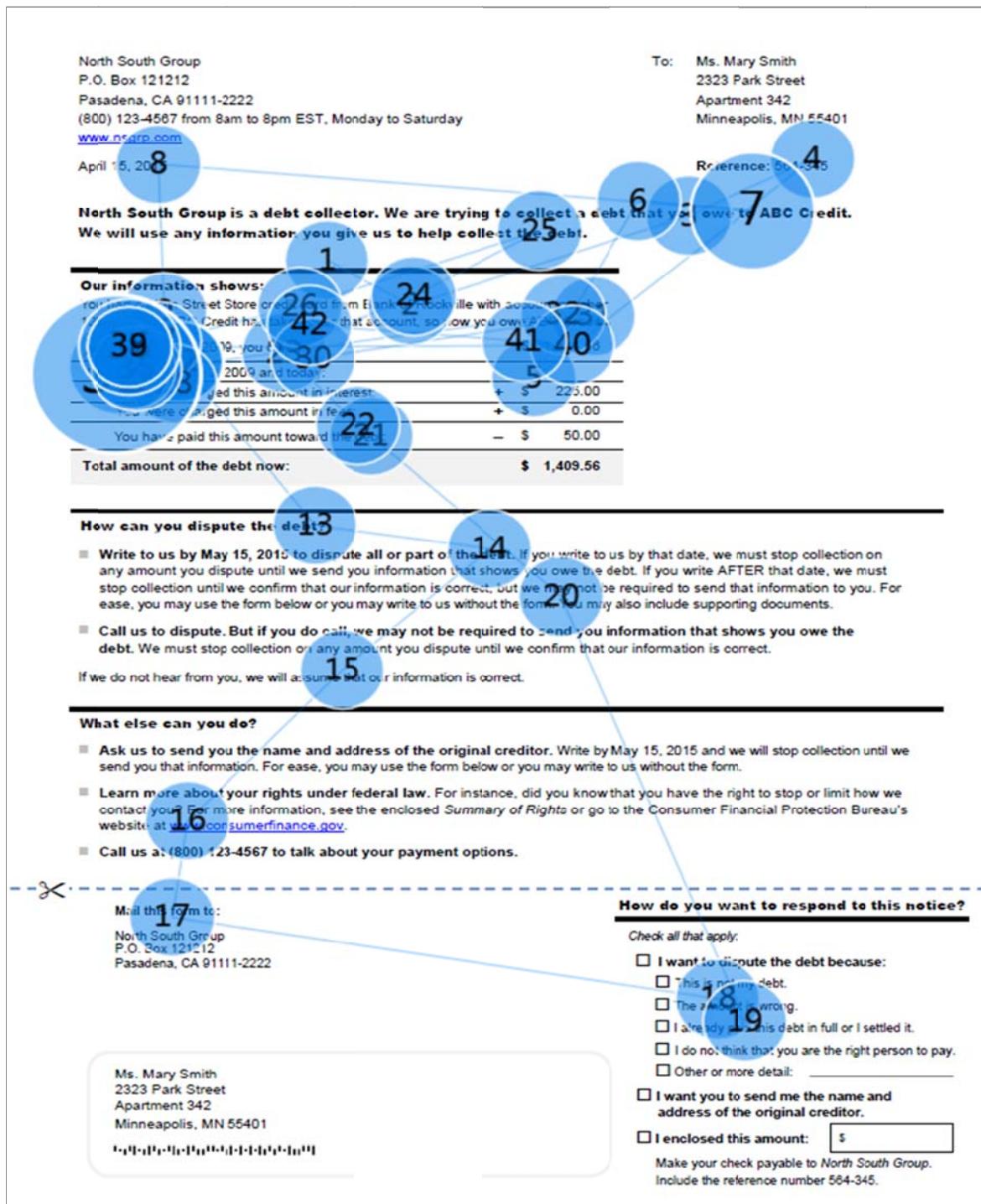


Figure 26. This gaze plot shows a participant in Round 2 who first fixated on the reference number and then fixated on the account number.

Round 3 Heat Map: "What is your account number with the company that lent you the money?"

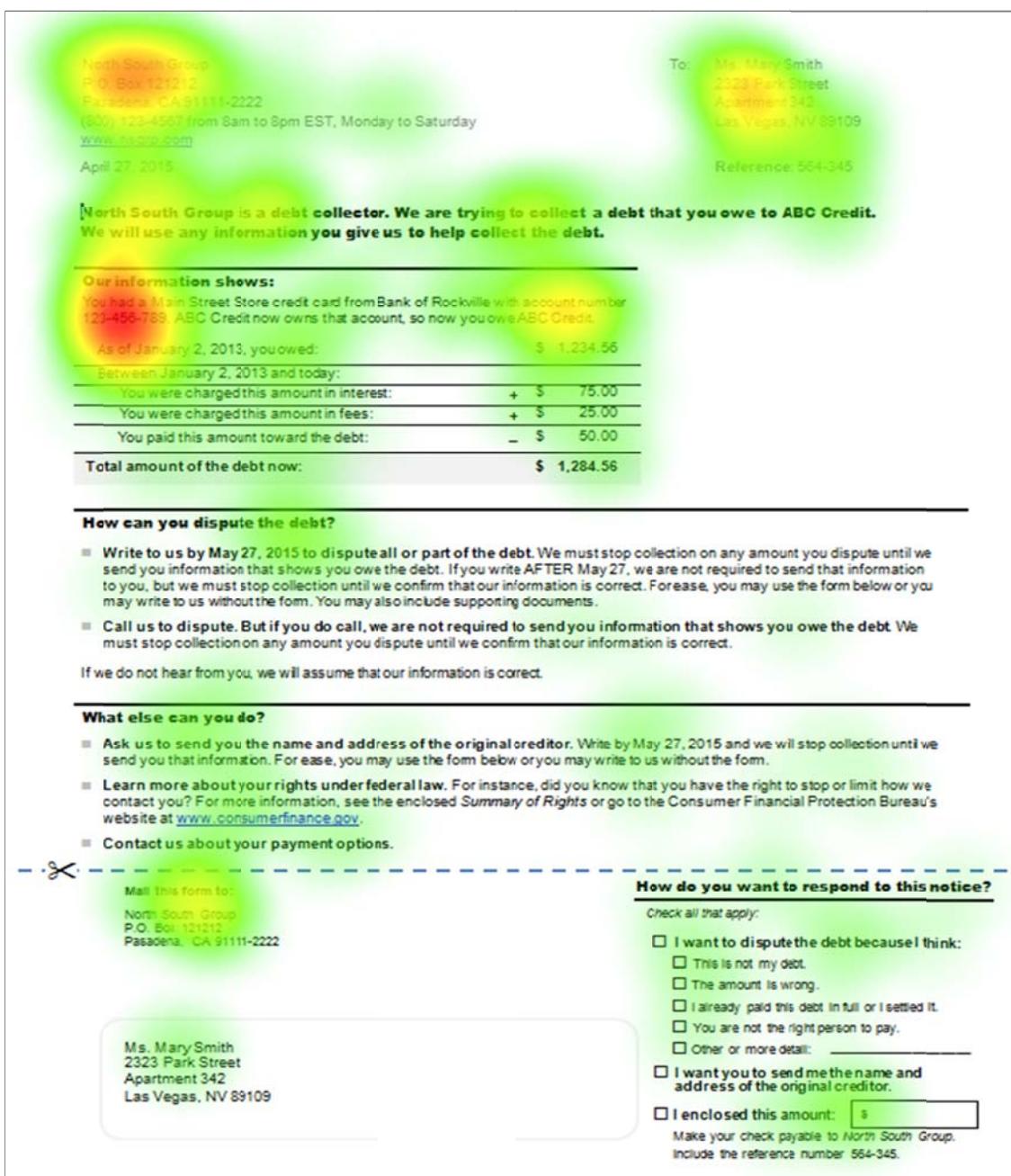


Figure 27. This heat map is a compilation of all eye fixations for all participants tested in Round 3 ( $n = 9$ ) that occurred after the moderator asked the question, "What is your account number with the company that lent you the money?" Participants fixated mostly on the account number, the top-right corner of the page, and the debt collector's information and address when responding to this question.

Round 3 Gaze Plot: "What is your account number with the company that lent you the money?"

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 27, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

**Information shows:**

1	20	10	9
11	13	7	4
12	14	15	16
17	18	19	21
1	2	3	5
6	8	10	11
12	13	14	15
16	17	18	19
20	21	22	23
24	25	26	27
28	29	30	31
32	33	34	35
36	37	38	39
40	41	42	43
44	45	46	47
48	49	50	51
52	53	54	55
56	57	58	59
60	61	62	63
64	65	66	67
68	69	70	71
72	73	74	75
76	77	78	79
80	81	82	83
84	85	86	87
88	89	90	91
92	93	94	95
96	97	98	99
100	101	102	103
104	105	106	107
108	109	110	111
112	113	114	115
116	117	118	119
120	121	122	123
124	125	126	127
128	129	130	131
132	133	134	135
136	137	138	139
140	141	142	143
144	145	146	147
148	149	150	151
152	153	154	155
156	157	158	159
160	161	162	163
164	165	166	167
168	169	170	171
172	173	174	175
176	177	178	179
180	181	182	183
184	185	186	187
188	189	190	191
192	193	194	195
196	197	198	199
200	201	202	203
204	205	206	207
208	209	210	211
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216	217	218	219
220	221	222	223
224	225	226	227
228	229	230	231
232	233	234	235
236	237	238	239
240	241	242	243
244	245	246	247
248	249	250	251
252	253	254	255
256	257	258	259
260	261	262	263
264	265	266	267
268	269	270	271
272	273	274	275
276	277	278	279
280	281	282	283
284	285	286	287
288	289	290	291
292	293	294	295
296	297	298	299
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308	309	310	311
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316	317	318	319
320	321	322	323
324	325	326	327
328	329	330	331
332	333	334	335
336	337	338	339
340	341	342	343
344	345	346	347
348	349	350	351
352	353	354	355
356	357	358	359
360	361	362	363
364	365	366	367
368	369	370	371
372	373	374	375
376	377	378	379
380	381	382	383
384	385	386	387
388	389	390	391
392	393	394	395
396	397	398	399
400	401	402	403
404	405	406	407
408	409	410	411
412	413	414	415
416	417	418	419
420	421	422	423
424	425	426	427
428	429	430	431
432	433	434	435
436	437	438	439
440	441	442	443
444	445	446	447
448	449	450	451
452	453	454	455
456	457	458	459
460	461	462	463
464	465	466	467
468	469	470	471
472	473	474	475
476	477	478	479
480	481	482	483
484	485	486	487
488	489	490	491
492	493	494	495
496	497	498	499
500	501	502	503

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109  
Reference: 564-345

**How can you dispute the debt?**

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

Mall this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

**How do you want to respond to this notice?**

Check all that apply:

I want to dispute the debt because I think:
 

- This is not my debt.
- The amount is wrong.
- I already paid this debt in full or I settled it.
- You are not the right person to pay.
- Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_  
Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 28. This gaze plot shows a participant who first fixated on the reference number and then moved her gaze to the account number.

The moderator also asked participants, “Who should you send the payment to?” Most participants—26 of 30—correctly responded that payment should be sent to the North South Group.

In Round 2, a reference to payment options was added to the notices. In Round 2, this section read: “**Call us at (800) 123-4567 to talk about your payment options.**” In Round 3, this section read: “**Contact us about your payment options.**” In Rounds 2 and 3, after the moderator asked participants who they should send payments to, the moderator asked: “What could you do if you’re interested in payment options?” Participants’ comments suggested that most *did* notice the section explaining that they could contact North South Group to discuss payment options. For example, one participant in Round 2 said, “Call them up and tell them your situation, that you don’t have money and you need to make payment. They have an address. They have a phone number. 1-800-123-4567.” Another participant from Round 2 said, “I would talk to them to find out what type of interest was going to be applied to it. What my total overall monthly income is, how much money do I have going out, what do I have free to work with, and use about 33% of that to send toward the debt collectors.” Three participants across Rounds 2 and 3 expected to see payment options as a choice on the tear-off. For example, one participant in Round 2 said, “In order to change my payment options, I guess I would probably write a letter. They don’t give me a box to check otherwise.” As another example, a participant in Round 3 said, “No, I don’t see anything about payment options [on the tear-off]. It just says, ‘Contact us about your payment options.’”

The moderator then asked participants, “Who do you owe the money to now?” Across the three rounds, the responses were fairly split between ABC Credit (15) and North South Group (13). The split in responses could be a function of ambiguity about the term “owe.” Some participants might have interpreted “owe” to have the same meaning as “send the payment.” Other participants might have correctly interpreted the question as asking about who owned the debt.

Heat maps and gaze plots were generated from participants’ eye movements when they were responding to the question: “Who do you owe the money to now?” In Round 1, the heat map shows that participants fixated more on the debt collector’s contact information, relative to other areas on the notice (see Figure 29). Participants in Round 1 typically did not fixate on the sentence explaining that the debt is owed to ABC Credit. The gaze plots from Round 1 show that most participants either looked in the top-left corner or quickly scanned the notice for the information (see Figures 30 and 31). In Rounds 2 and 3, however, the heat maps show that participants fixated primarily on the opening sentence and the sentence that explains that the debt is owed to ABC Credit (see Figures 32 and 34). The greater number of fixations on the latter sentence suggests that participants were more likely to expect to find this information in the new location.

## Round 1 Heat Map: "Who do you owe the money to now?"

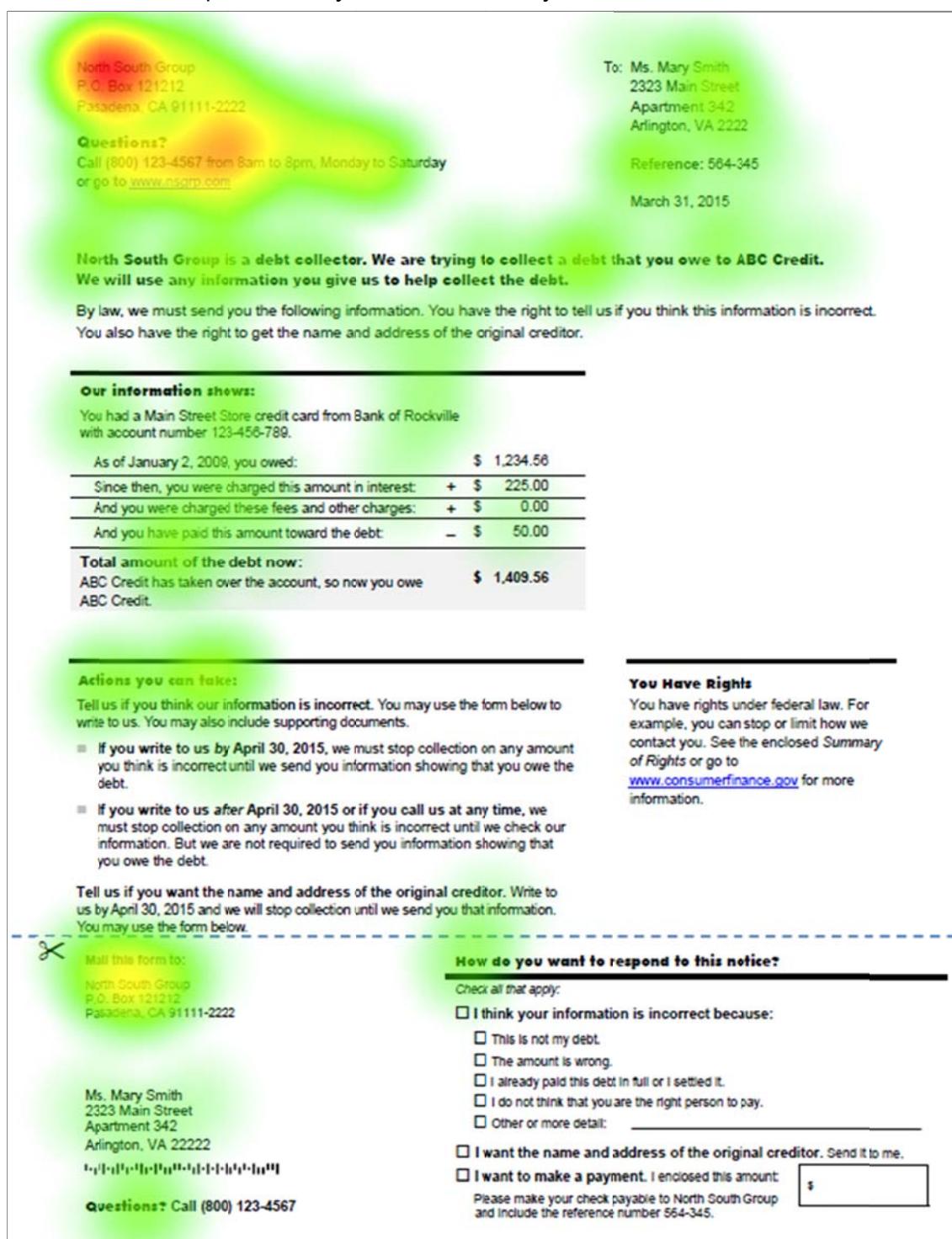


Figure 29. This heat map is a compilation of all eye fixations for all participants tested in Round 1 ( $n = 10$ ) that occurred after the moderator asked the question, "Who do you owe the money to now?" Participants fixated mostly on the debt collector's information in the top-left corner.

## Round 1 Gaze Plot: "Who do you owe the money to now?"

6 8 109  
111-2222

**Questions?**  
Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 2222  
Reference: 564-345  
March 31, 2015

**1 North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

---

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00

**Total amount of the debt now:**  
ABC Credit has taken over the account, so now you owe \$ 1,409.56  
ABC Credit.

---

**Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.

X Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222  
111-2222

**How do you want to respond to this notice?**

Check all that apply:

I think your information is incorrect because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:  
Please make your check payable to North South Group and include the reference number 564-345.

**Questions? Call (800) 123-4567**

Figure 30. This gaze plot shows a participant who fixated on the debt collector's contact information.

Round 1 Gaze Plot: "Who do you owe the money to now?"

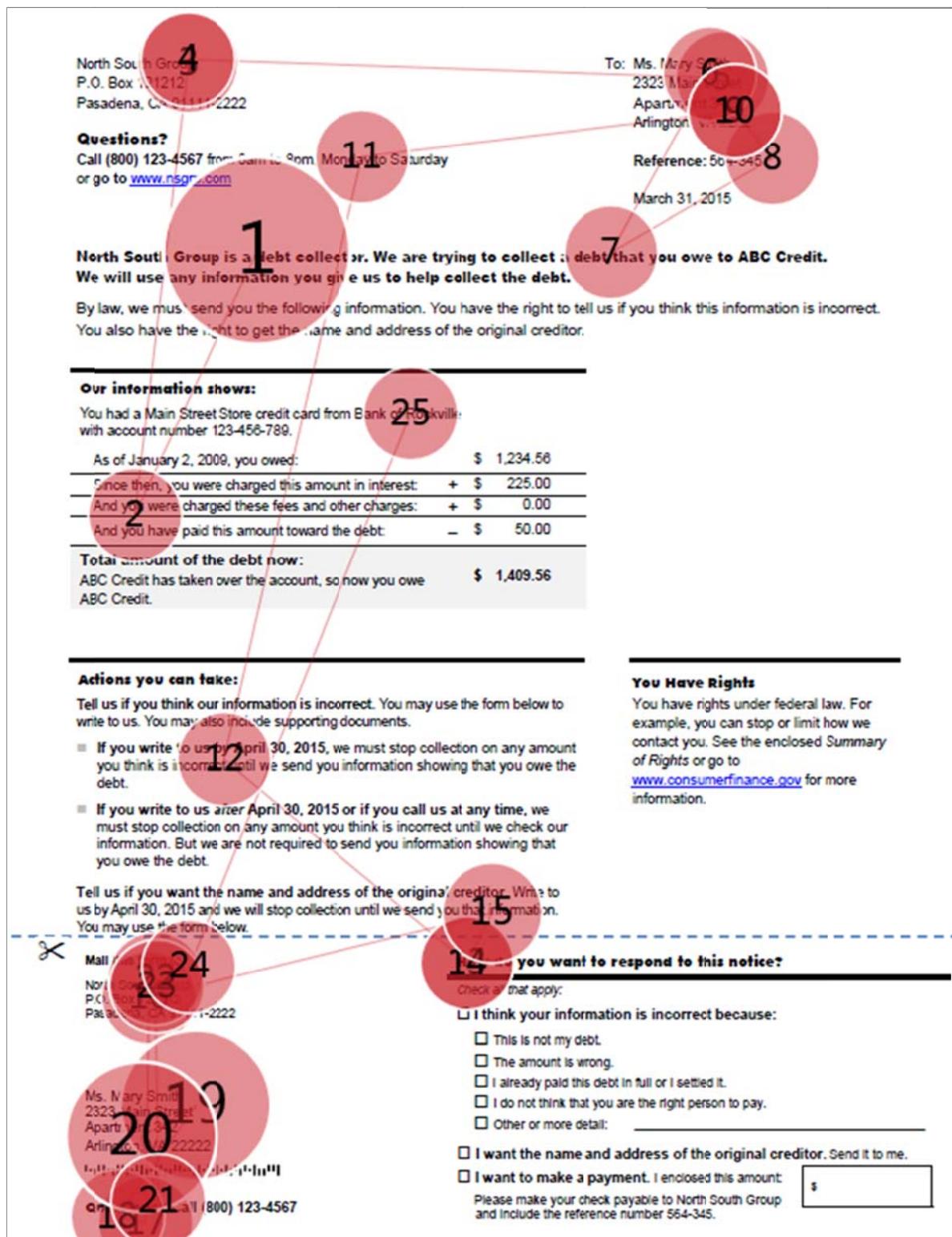


Figure 31. This gaze plot shows a participant who fixated on different areas on the notice, but not on the sentence that explained that the debt is owed to ABC Credit.

## Round 2 Heat Map: "Who do you owe the money to now?"

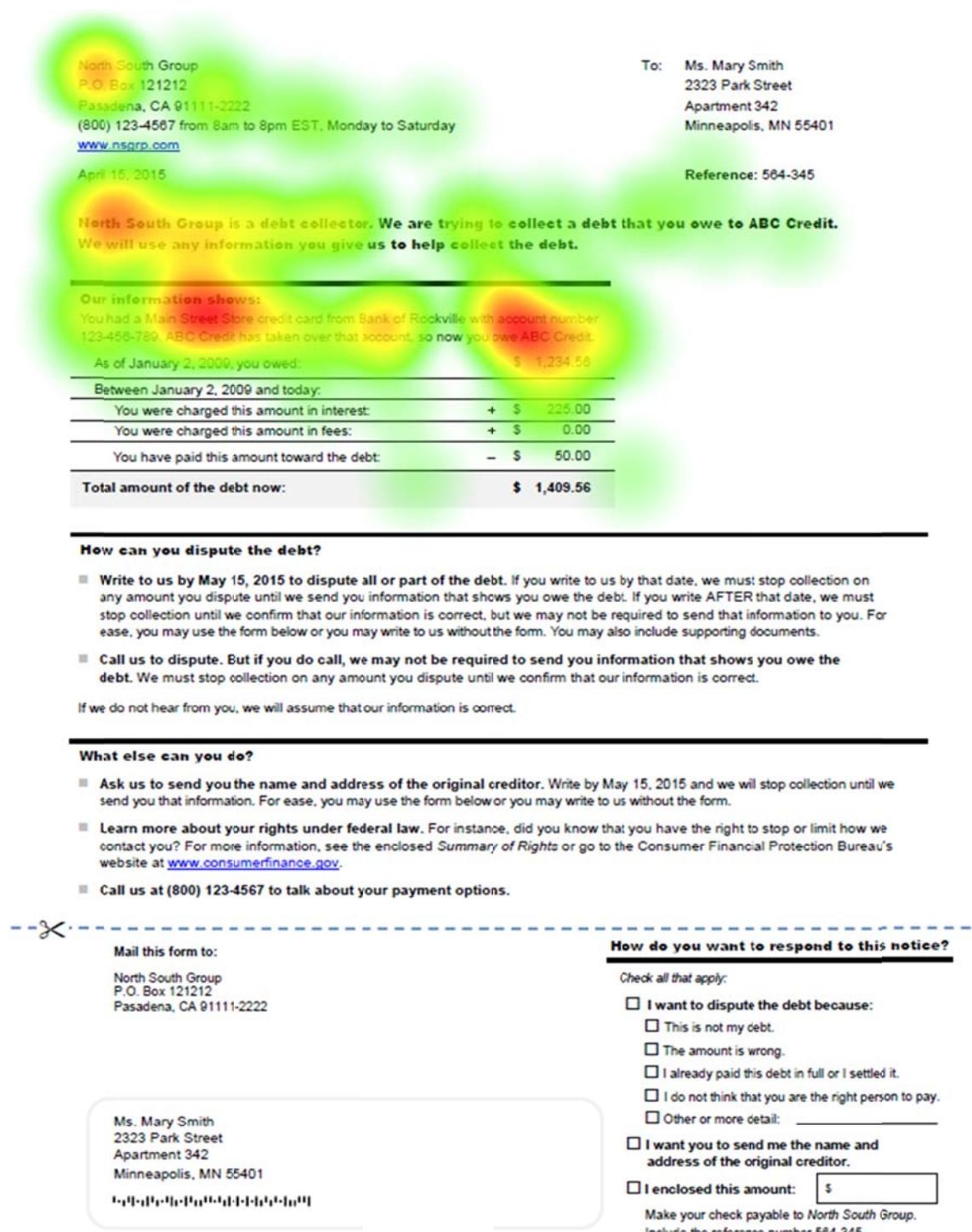


Figure 32. This heat map is a compilation of all eye fixations from participants tested in Round 2 ( $n = 6$ ) that occurred after the moderator asked the question, "Who do you owe the money to now?" Participants fixated mostly on the introduction sentence and the sentence that explained that the debt is owed to ABC Credit.

## Round 2 Gaze Plot: "Who do you owe the money to now?"

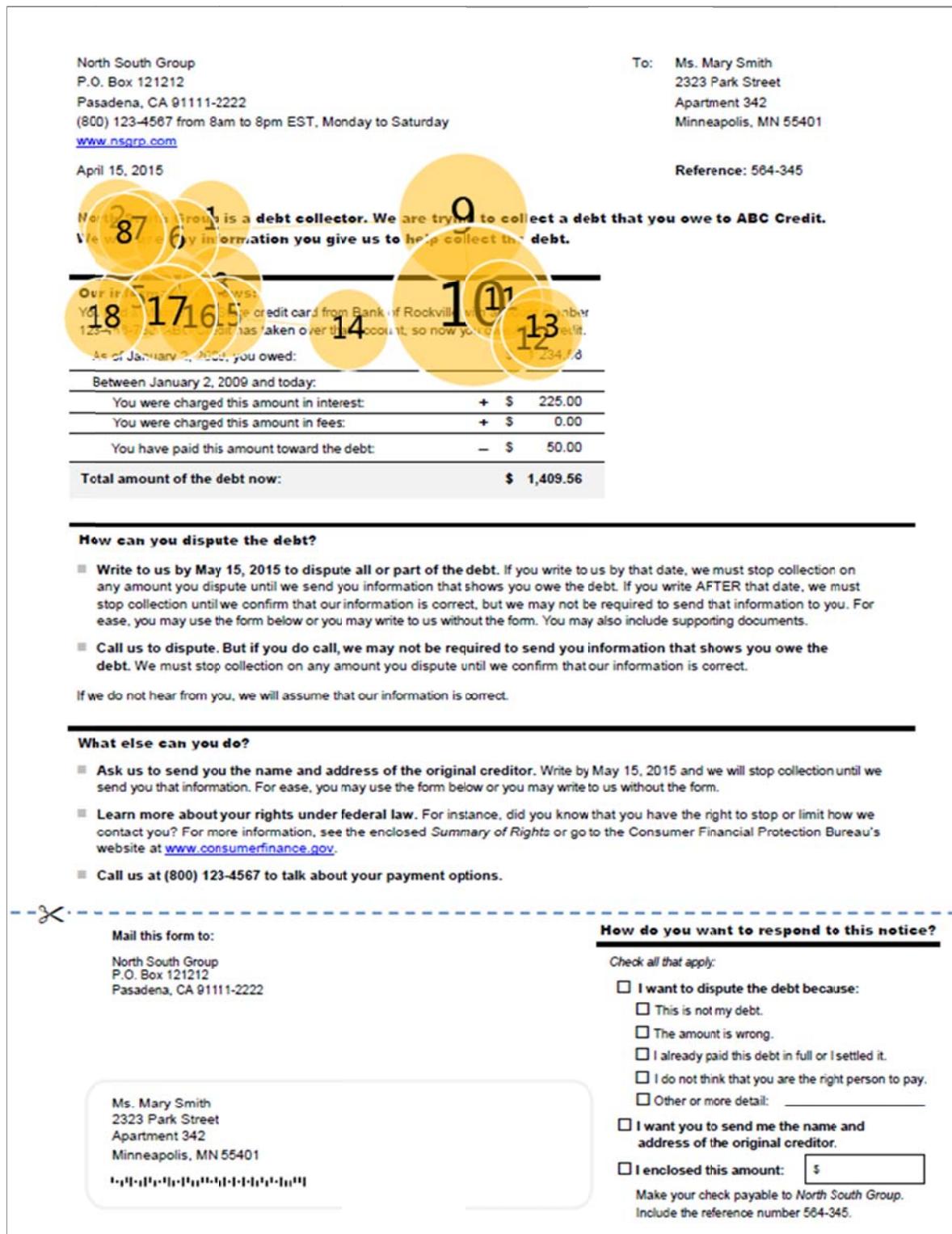


Figure 33. This gaze plot shows a participant who fixated on the introductory sentence, as well as the sentence that explained that the debt is owed to ABC Credit.

### Round 3 Heat Map: "Who do you owe the money to now?"

**North South Group**  
 P.O. Box 121212  
 Pasadena, CA 91111-2222  
 (800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.consumergroup.com](http://www.consumergroup.com)

To: Ms. Mary Smith  
 2323 Park Street  
 Apartment 342  
 Las Vegas, NV 89109

From: [REDACTED]  
 Date: April 22, 2015  
 Reference: 564-345

**[North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.]**

---

**Our information shows:**  
 You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,284.56</b>

---

**How can you dispute the debt?**

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

---

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

Mail this form to:  
 North South Group  
 P.O. Box 121212  
 Pasadena, CA 91111-2222

Ms. Mary Smith  
 2323 Park Street  
 Apartment 342  
 Las Vegas, NV 89109

---

**How do you want to respond to this notice?**

Check all that apply:

I want to dispute the debt because I think:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 You are not the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_  
 Make your check payable to North South Group.  
 Include the reference number 564-345.

Figure 34. This heat map is a compilation of all eye fixations from participants tested in Round 3 ( $n = 9$ ) that occurred after the moderator asked the question, "Who do you owe the money to now?" Participants fixated mostly on the introduction sentence and the sentence that explained that the debt is owed to ABC Credit.

The moderator continued to ask questions about the parties associated with the debt. When the moderator asked participants, “Is there a brand associated with the debt?”, 19 of the 28 participants who were asked this question correctly stated that Main Street Store was the brand associated with the debt. Eight participants said that the Bank of Rockville was the brand and one participant was unsure. Some participants made comments that suggested they were unsure what term “brand” referred to in this context.

As a follow-up to the question about the brand associated with the debt, the moderator asked, “Who is Main Street Store?” Twenty-three participants accurately stated it was a department or retail store. Many participants also explained that the purchase was completed with a Main Street Store credit card. One participant in Round 1 said, “Credit card debt with a Main Street Store credit card.” Similarly, another participant in Round 1 said, “Oh, I see it right here, Main Street Store is the name of the credit card.” Very few participants said that they were unsure what Main Street Store was or thought it was an address. See Figure 35 for a full distribution of responses.

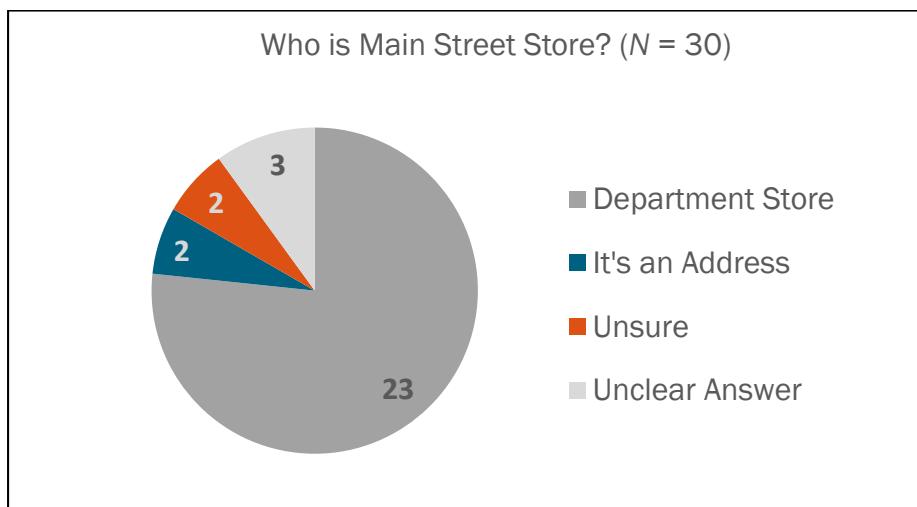


Figure 35.

Overall, the relationship between the parties associated with the debt was a complicated concept for participants across the rounds. While most participants could correctly answer specific questions related to the different parties identified on the notice, such as the original account number or where to send the payment, the relationship of different parties in the overall debt collection process was less clear. During debriefing, the moderator asked participants, “What questions do you have after reading this?” Several participants’ responses centered on the lack of information about how the parties related to one another. One participant from Round 2 said, “I originally saw it as I owed the creditor . . . and I got the credit through this Bank of Rockville. And now ABC Credit was collecting it. And I wasn’t sure about North South Group. So now I’m confused about how Bank of Rockville didn’t go directly to North South Group and how ABC Credit got involved. So I guess I’m confused about who ABC Credit is if they’re not a debt collector.”

## **6.0 Disputing the Debt**

### **6.1 Changes to the “Actions you can take” and “How can you dispute the debt?” sections**

A central section of the notice addresses consumer dispute rights, and this section of the notice underwent significant changes across the rounds of testing. Some changes were made to improve consumer understanding. For example, in Round 2, the following language was added to the notices: “If we do not hear from you, we will assume that our information is correct.”

Other changes to this section were made in response to comments from participants during Round 1 to improve usability and understanding. For example, participants did not appear to readily connect the “Actions you can take” section with disputing the debt, so this section was renamed “How can you dispute the debt?” As a result, the language describing how to request the name and address of the original creditor was moved to a new “What else can you do?” section. In addition, in Round 1, some participants did not understand whether they needed to use the tear-off to write to dispute the debt or if they could write in separately. Thus, in Round 2, language was added to the form stating, “For your ease, you may use the form below or you may write to us without the form.”

Figures 36 through 39 show the changes made to the dispute sections of the forms in more detail.

## “Actions you can take” Changes: Arlington (Round 1) to Minneapolis (Round 2)

### Round 1: Actions you can take

1 **Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

2

3

If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.

If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

4

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.

Figure 36.

### Round 2: How can you dispute the debt?

1 **How can you dispute the debt?**

Write to us by May 15, 2015 to dispute all or part of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.

Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

5 If we do not hear from you, we will assume that our information is correct.

4 **What else can you do?**

Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.

Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).

Call us at (800) 123-4567 to talk about your payment options.

Figure 37.

- 1 “Actions you can take” was split into “How can you dispute the debt?” and “What else can you do?”
- 2 Removed “Tell us if you think our information is incorrect . . .”
- 3 Dispute language was reorganized to be based on communication method instead of date.
- 4 Moved “Tell us if you want the name and address of the original creditor” and changed language.
- 5 Added “If we do not hear from you, we will assume that our information is correct.”
- 6 Information in the “You Have Rights” section was moved from the right side of the page to the “What else can you do?” section, and information on calling to discuss payment options was added.

## “How can you dispute the debt?” Changes: Minneapolis (Round 2) to Las Vegas (Round 3)

### Round 2: How can you dispute the debt?

#### How can you dispute the debt?

1

- Write to us by May 15, 2015 to dispute all or part of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

#### What else can you do?

2

- Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau’s website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Call us at (800) 123-4567 to talk about your payment options.

Figure 38.

### Round 3: How can you dispute the debt?

#### How can you dispute the debt?

1

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

#### What else can you do?

2

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau’s website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

Figure 39.

1 Altered language in first bullet:

- Removed “If you write to us by that date . . .” from “We must stop collection on any amount you dispute . . .”
- Changed “that date” to “May 27”; changed order and language of “. . . we must stop collection until we confirm that our information is correct” and “we are not required to send that information to you.”

2 Changed “Call us at (800) . . . to talk about your payment options” to “Contact us about your payment options.”

## 6.2 Comprehension and understanding

To assess understanding of the dispute section of the notice, the moderator asked participants: “Imagine you received this notice, but did not think you owed the debt. What could you do?” Participants gave varying responses across the rounds, but all participants understood that they had options for contacting the debt collector to dispute the debt.

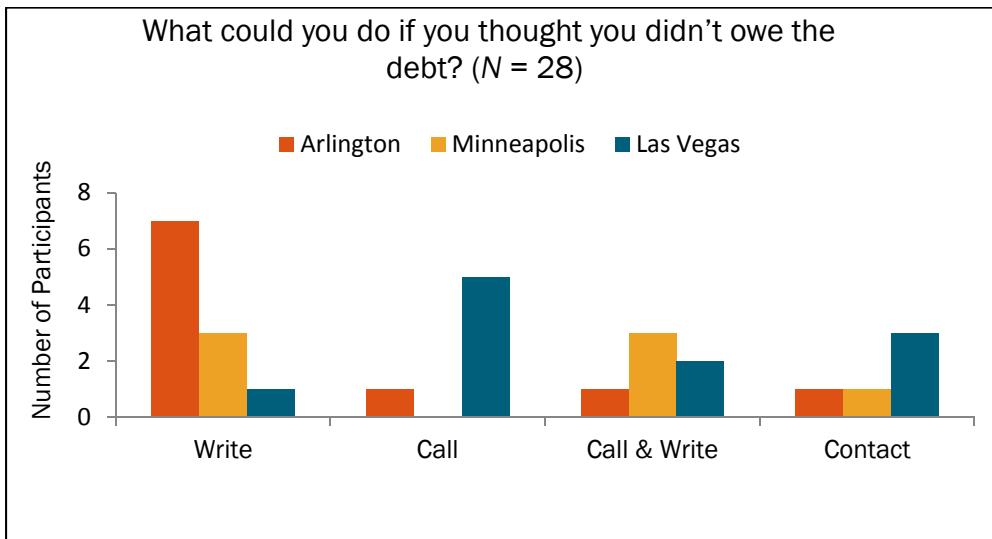


Figure 40.

Heat maps and gaze plots were generated from participants' eye movements to determine how their attention was allocated to different parts of the notice after the following question was asked: “What could you do if you thought you didn't owe the debt?” The heat map for Round 1 shows that participants fixated more on the “Actions you can take” and tear-off sections (see Figure 41). The example gaze plot from Round 1 shows that this participant first fixated on the tear-off and then moved to the more detailed information about how to dispute the debt (Figure 42). Although participants did not necessarily always begin at the tear-off and move to the “Actions you can take” section, these were the two most fixated sections of the notice when responding to this question. Similarly, in Rounds 2 and 3, the heat maps show high frequency counts of fixations on the “How can you dispute the debt?” and “How do you want to respond to this notice?” sections (Figures 43 and 45). This evidence suggests that it was clear to participants how to find the information about how to respond if the consumer did not think the debt belonged to them.

Round 1 Heat Map: “Imagine you received this notice, but did not think you owed the debt. What could you do?”

A heat map visualization showing areas of high (red/orange) and low (green/blue) participant eye fixations on a debt collection notice. The form includes sections for sender information, recipient information, a warning about being a debt collector, legal rights, actions to take, and a response section.

**North South Group**  
P.O. Box 121212  
Pasadena, CA 91111-2222

**To:** Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions?**  
Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

**To:** Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Reference:** 564-345  
March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00

**Total amount of the debt now:**  
ABC Credit has taken over the account, so now you owe \$ 1,409.56  
ABC Credit.

**Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.

**Mail this form to:**  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

**Ms. Mary Smith**  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions? Call (800) 123-4567**

**You Have Rights**  
You have rights under federal law. For example, you can stop or limit how we contact you. See the enclosed Summary of Rights or go to [www.consumerfinance.gov](http://www.consumerfinance.gov) for more information.

**How do you want to respond to this notice?**

Check all that apply:

I think your information is incorrect because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:  
Please make your check payable to North South Group and include the reference number 564-345.  
\$ \_\_\_\_\_

Figure 41. This heat map is a compilation of all eye fixations from participants tested in Round 1 ( $n = 6$ ) that occurred after the moderator asked the question, “Imagine you received this notice, but did not think you owed the debt. What could you do?” Participants fixated mostly on the “Actions you can take” and the “How do you want to respond to this notice?” sections.

Round 1 Gaze Plot: "Imagine you received this notice, but did not think you owed the debt. What could you do?"

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions?**  
Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

Reference: 564-345  
March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

---

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00

**Total amount of the debt now:**  
ABC Credit has taken over the account, so now you owe ABC Credit. **\$ 1,409.56**

---

**Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing why you owe the debt.
- If you write to us by April 30, 2015, and you tell us you do not owe the amount, we must stop collection on any amount you think is incorrect. We do not require you to send us proof you do not owe the debt.

Tell us if you want the name and address of the original creditor. Send us by April 30, 2015 and we will stop collection until we send you the information. You may use the form below.

**13 You Have Rights**  
You have rights under federal law. For example, you can stop or limit how we contact you. See the enclosed Summary of Rights or go to [www.consumerfinance.gov](http://www.consumerfinance.gov) for more information.

---

**Now do you want to respond to this notice?**

Check all that apply:

**1**

- I think your information is incorrect because:
  - This is not my debt.
  - The amount is wrong.
  - I already paid this debt in full or I settled it.
  - I do not think that you are the right person to pay.
  - Other or more detail: \_\_\_\_\_
- I want the name and address of the original creditor. Send it to me.
- I want to make a payment. I enclosed this amount:  
Please make your check payable to North South Group and include the reference number 564-345.  
\$ \_\_\_\_\_

Figure 42. This gaze plot shows a participant who first fixated on the "How do you want to respond to this notice?" section, and then fixated on the "Actions you can take" section.

Round 2 Heat Map: “Imagine you received this notice, but did not think you owed the debt. What could you do?”

<p>North South Group P.O. Box 121212 Pasadena, CA 91111-2222 (800) 123-4567 from 8am to 8pm EST, Monday to Saturday <a href="http://www.nsgrp.com">www.nsgrp.com</a></p> <p>April 15, 2015</p>	<p>To: Ms. Mary Smith 2323 Park Street Apartment 342 Minneapolis, MN 55401</p> <p>Reference: 564-345</p>
--	--

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

---

**Our information shows:**  
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$ 1,234.56
Between January 2, 2009 and today:	
You were charged this amount in interest:	+ \$ 225.00
You were charged this amount in fees:	+ \$ 0.00
You have paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>

---

**How can you dispute the debt?**

- Write to us by May 15, 2015 to dispute **all or part** of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write **AFTER** that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

---

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Call us at (800) 123-4567 to talk about your payment options.

Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401  
[564-345@nsgrp.com](mailto:564-345@nsgrp.com)

**How do you want to respond to this notice?**

Check all that apply:

I want to dispute the debt because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 43. This heat map is a compilation of all eye fixations from participants tested in Round 2 ( $n = 5$ ) that occurred after the moderator asked the question, “Imagine you received this notice, but did not think you owed the debt. What could you do?” Participants fixated mostly on the “How do you want to dispute the debt?” and “How do you want to respond to this notice?” sections.

Round 2 Gaze Plot: "Imagine you received this notice, but did not think you owed the debt. What could you do?"

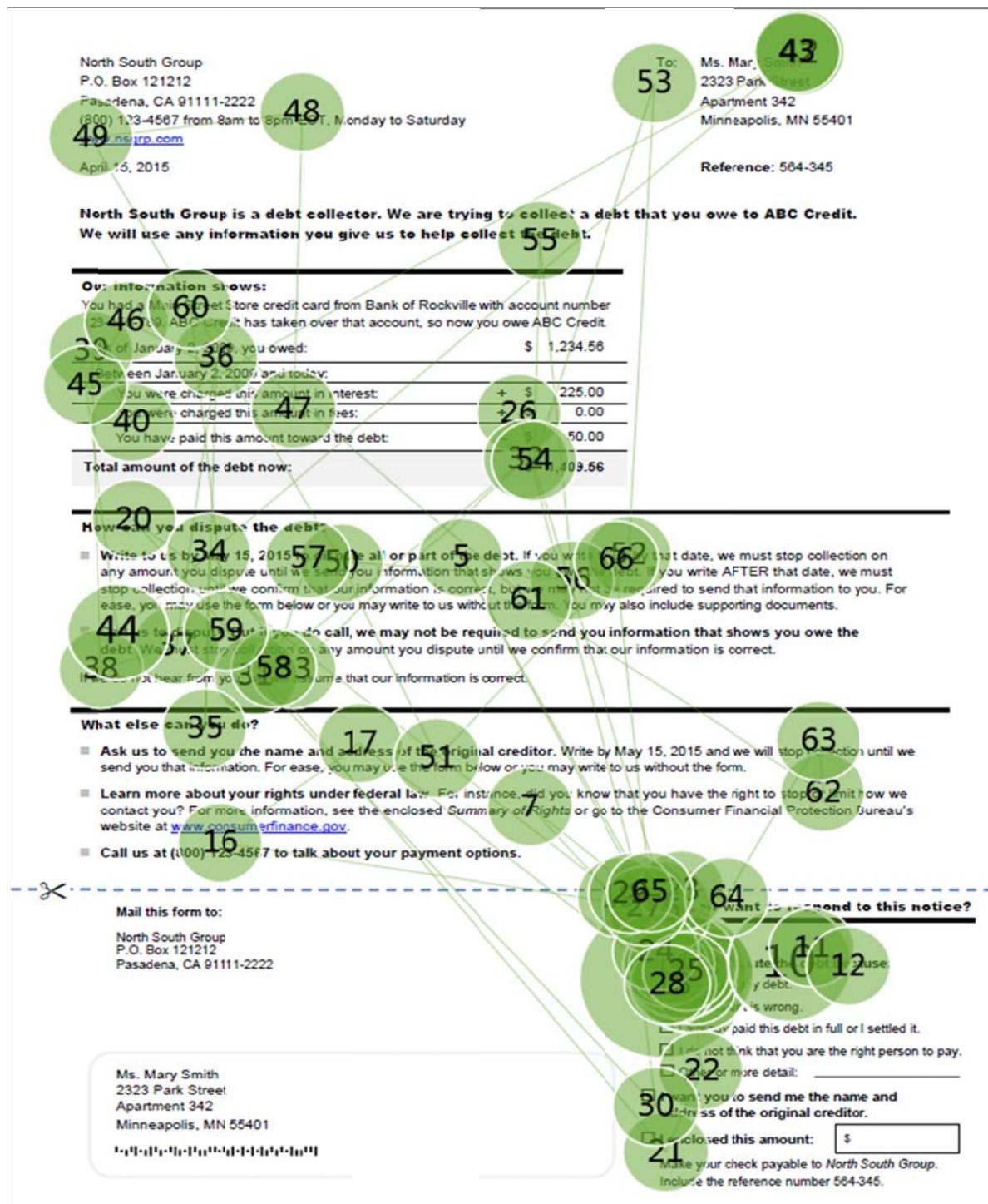


Figure 44. This gaze plot shows a participant who fixated mostly on the "How do you want to dispute the debt?" and "How do you want to respond to this notice?" sections.

Round 3 Heat Map: "Imagine you received this notice, but did not think you owed the debt. What could you do?"

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 27, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,284.56

**How can you dispute this debt?**

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

**Mail this form to:**  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

**Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109**

**How do you want to respond to this notice?**

Check all that apply

I want to dispute the debt because I think:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 You are not the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$   
Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 45. This heat map is a compilation of all eye fixations from participants tested in Round 3 ( $n = 8$ ) that occurred after the moderator asked the question, "Imagine you received this notice, but did not think you owed the debt. What could you do?" Participants fixated mostly on the "How do you want to dispute the debt?" and "How do you want to respond to this notice?" sections.

Round 3 Gaze Plot: "Imagine you received this notice, but did not think you owed the debt. What could you do?"

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

April 27, 2015

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

**Our information shows:**  
You had a Main Street Store credit card from Fair Credit. Your account number is 123-456-789. ABC Credit now owns that account. As of January 2, 2013, you owe \$1,234.56.  
Between January 2, 2013 and April 27, 2015, you were charged this amount in fees:  
You were charged this amount in fees:  
You paid this amount toward the debt:  
Total amount of the debt now:

**How can you dispute the debt?**

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collecting until we confirm that our information is correct. Please, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we must stop collection until we send you that information. You may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop debt collectors from contacting you? For more information, see the enclosed *Summary of Rights* or go to the Federal Trade Commission's website at [www.ftc.gov](http://www.ftc.gov).
- Contact us about your payment options.

**Mail this form to:**  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

**How do you want to respond to this notice?**

I am disputing the debt because I think:  
The amount is wrong.  
I already paid this debt in full or I settled it.  
You are not the right person to pay.  
Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_  
Make your check payable to North South Group.  
Include the reference number 564-345.

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Figure 46. This gaze plot shows a participant who fixated mostly on the "How do you want to dispute the debt?" and "How do you want to respond to this notice?" sections.

The notice explained what would happen if a consumer wrote or called to dispute the debt before or after a certain date. If the consumer wrote before a certain date, the debt collector was required to send the consumer information related to the debt. If the consumer wrote after the date or called to dispute at any time, the debt collector was required to confirm its information but was not required to send the consumer this information. To assess participants' understanding about the dispute process, the moderator asked a series of comprehension questions. Initial questions addressed the overall consequences of taking or not taking action. In Round 1, eight participants made comments that suggested they understood the consequence of (1) writing before the specified date and (2) writing after or calling anytime. In Round 2, five participants made comments that suggested they understood the consequence of writing before the specified date or writing after or calling anytime. And in Round 3, seven participants made comments that suggested they understood the same consequence.

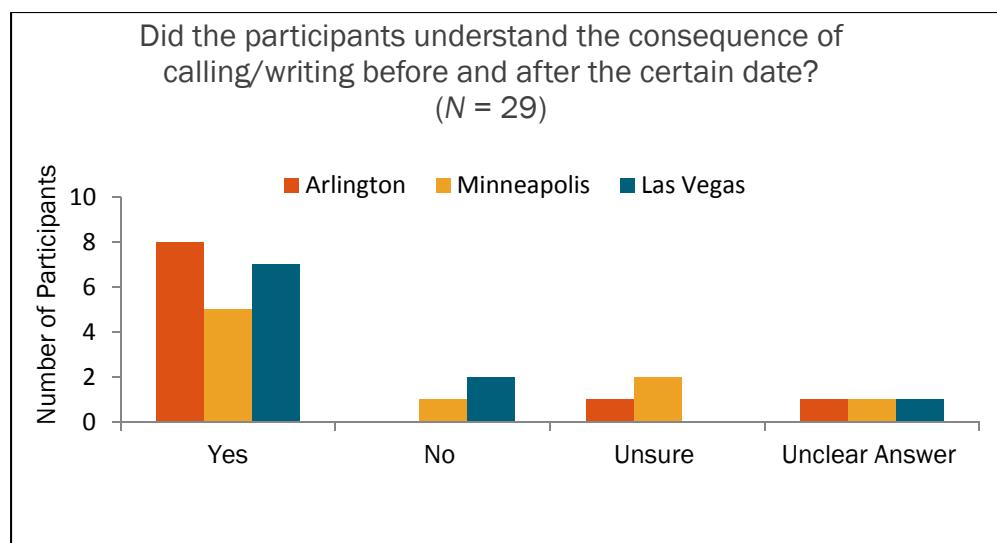


Figure 47.

As a follow-up question, the moderator asked, “Is there a difference in what happens if you write or call?” In Round 1, language on the notice emphasized that disputing before or after April 30<sup>1</sup> would affect the actions that the debt collector would take. This was done by separating the sections with the following bolded text: “If you write to us by April 30, 2015 . . .” and “If you write to us after April 30, 2015, or if you call us at any time . . .” In Round 1, participants did not tend to understand the consequence of calling rather than writing: three said calling was not an option, and five said that there was no difference between writing and calling. Also, during the debrief questions in Round 1, when the moderator asked participants about points that were confusing or unclear, the “Actions you can take” section was often discussed. One participant said, “That I can call anytime . . .

<sup>1</sup>The dates used on the sample notices were modified in each round to reflect a date approximately 30 days from the time of testing.

that's a little confusing." Another participant said, "It says 'if you write to us by April 30 we will stop collection and will not send info,' but it doesn't say what they would do to determine if that was me. And then the section where it says 'write after April 30,' it says that they are not required to send info that I own the debt. They cancel each other out." Another participant said, "I'm confused about what the difference would be between writing before or after April 30. It sounds like they are saying the same thing. I would want to deal with this right away, but otherwise I think I would just brush it off."

After Round 1, this section was changed so that the key distinction centered not on the date, but on the actions the consumer could take: writing or calling. The "Write to us" section further explained that writing before or after May 15 would result in the debt collector taking different actions. Following these changes, participants exhibited less confusion. In Round 2, six participants said there was a difference between calling and writing and three said there was not. In Round 3, six participants said there was a difference and four said that there was not. (See Figure 48 for the complete distribution of responses.) Participants' comments suggested it was easier to comprehend this section after the edits. Only two participants in Round 2 discussed this section as a point of confusion during debriefing. Some participants *did* comment that they disliked the fact that debt collectors were not required to send them additional information if they called or if they wrote after a certain date.

Overall, participants' comments suggest that they understood the difference between writing before the specified date, writing after that date, and calling, even if they were not pleased that these distinctions existed. For Round 3, the language of "may not be required" to provide information was changed to "are not required." Comparatively, in Round 3, only one person expressed confusion about this section during the debriefing interview. This participant said, "'If you write us after May 27, we're not required to send that information to you.' It's not exactly unclear; it just slightly is."

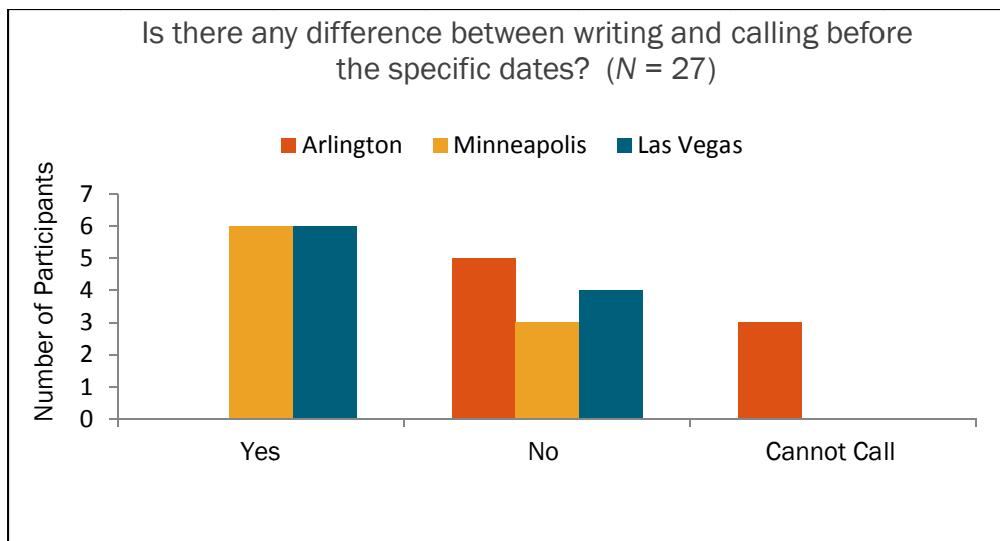


Figure 48.

## 7.0 Tear-Off

### 7.1 Changes to the tear-off

The notice includes a tear-off portion that consumers can use to respond to the notice. Relatively minor changes to the tear-off were made between rounds, as shown in Figures 49 through 52.

#### Tear-Off Changes: Arlington (Round 1) to Minneapolis (Round 2)

Round 1: How do you want to respond to this notice?

**How do you want to respond to this notice?**

*Check all that apply:*

- 1  I think your information is incorrect because:
  - This is not my debt.
  - The amount is wrong.
  - I already paid this debt in full or I settled it.
  - I do not think that you are the right person to pay.
  - Other or more detail: \_\_\_\_\_
- 2  I want the name and address of the original creditor. Send it to me.
- 3  I want to make a payment. Enclosed this amount:  
 Please make your check payable to North South Group and include the reference number 564-345.
- 4

Figure 49.

Round 2: How do you want to respond to this notice?

**How do you want to respond to this notice?**

*Check all that apply:*

1  I want to dispute the debt because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

2  I want you to send me the name and address of the original creditor.

3  I enclosed this amount: \$ \_\_\_\_\_  
Make your check payable to *North South Group*.  
Include the reference number 564-345.

Figure 50.

- 1 Changed language "I think your information is incorrect because:" to "I want to dispute the debt because:"
- 2 Changed "I want the name and address of the original creditor. Send it to me." to "I want you to send me the name and address of the original creditor."
- 3 Changed "I want to make a payment" to "I enclosed this amount:"
- 4 Removed "Please" from "Please make your check payable to North South Group and include the reference number . . ."

### Tear-Off Changes: Minneapolis (Round 2) to Las Vegas (Round 3)

Round 2: How do you want to respond to this notice?

**How do you want to respond to this notice?**

*Check all that apply:*

1  I want to dispute the debt because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_  
Make your check payable to *North South Group*.  
Include the reference number 564-345.

Figure 51.

Round 3: How do you want to respond to this notice?

**How do you want to respond to this notice?**

*Check all that apply:*

2  I want to dispute the debt because **I think:**  

This is not my debt.

The amount is wrong.

I already paid this debt in full or I settled it.

You are not the right person to pay.

Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$

Make your check payable to *North South Group*.  
Include the reference number 564-345.

Figure 52.

- 1 Changed “I do not think that you are the right person to pay” to “You are not the right person to pay.”
- 2 Added “I think” after “I want to dispute the debt because . . .”

## 7.2 Comprehension and understanding

To assess the usability of the tear-off, the moderator asked a series of comprehension questions. First, participants were asked, “Can you use the form to send the payment?” Twenty-eight participants answered yes and one participant did not directly answer the question. To further explore participants’ responses, the moderator asked, “How could you use this form to send a payment?” Twenty-five of the 27 participants who were asked this question said they would check the box and send the tear-off at the bottom of the sheet. Most participants simply stated that they could send the check with the tear-off but some specified that the check would be sent to North South Group. For example, one participant in Round 1, who specified that the check would be sent to North South Group said, “I could check the box and write in the amount. Make my check payable to North South Group. Cut off the bottom coupon and send it with the envelope that would be inside.” A participant in Round 3 said, “Yes. I could cut or tear off the bottom portion of this form. With the amount that I’m sending. And check all information that applies to this payment, including the amount. And all that would be made payable to the North South Group, including the reference number.” This suggests that consumers generally understood that payment should be sent to the North South Group and that the form can be used to send the payment.

The moderator also asked participants, “Could you use this form to write in [to dispute the debt]?” Twenty-two of the 24 participants who were asked this question responded

affirmatively. This suggests that participants understood that the form could be used to satisfy the write-in requirement.

The moderator continued to ask questions to determine if the items in the “How do you want to respond to this notice” list were usable. Participants were asked, “What if you recognized the debt as one you owed, but some information about the debt was incorrect? What could you do?” Of the 28 participants who were asked this question, 23 said they could use the box on the tear-off to dispute the debt. This suggests that participants understood how to use the form to dispute the debt.

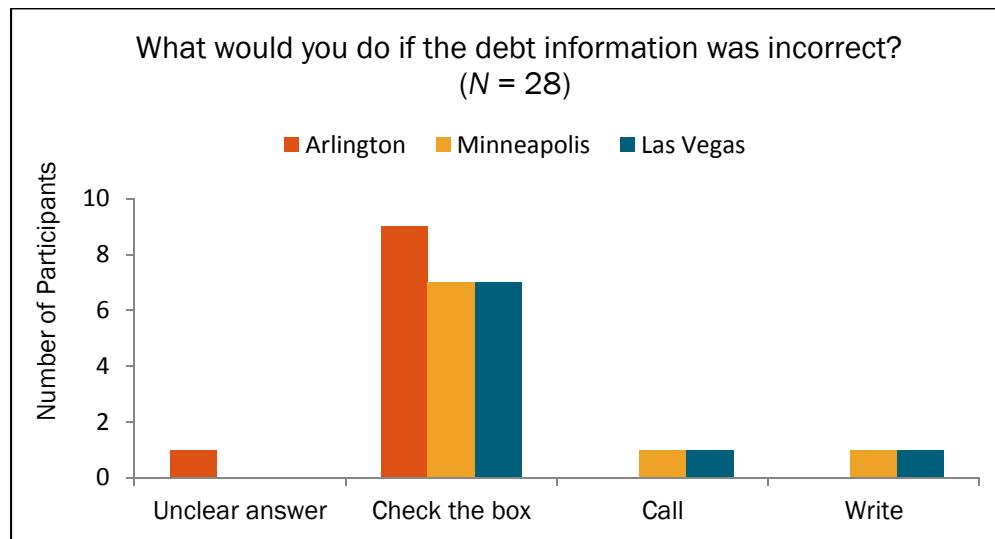


Figure 53.

The moderator also asked participants, “What if you recognized the debt as one you owed, but thought you should pay it to another collector? What could you do?” Participants’ answers to the question varied. Fourteen mentioned that they could check the box “You are not the right person to pay.” Other participants gave unclear or ambiguous responses. Still others suggested that they could contact the original creditor or another party but did not explicitly mention using the form. This suggests that participants might not have expected to see the “you are not the right person to pay” option on the tear-off, or to look to the tear-off to resolve this type of issue. See Figure 54 for the complete distribution of responses to this question.

What if you recognized the debt as one you owed, but thought you should pay it to another collector?  
(N = 29)

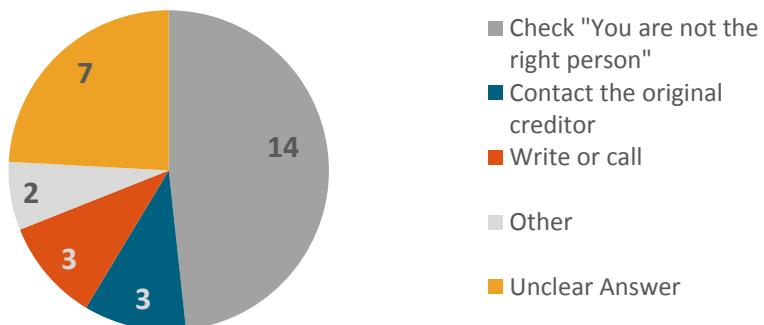


Figure 54.

## 8.0 Learn More Prompt and Cease Communication Example

All notices included language inviting participants to “Learn More” about their rights and directing them to a “Summary of Rights” document that was not included in this testing. This language also included an example of an additional right: specifically, that the consumer could stop or limit contact with the debt collector. To assess the clarity of the language explaining consumers’ options to stop or limit debt collector contact, the moderator asked participants, “If you wanted the debt collector to stop or limit contact with you, what could you do?” Heat maps and gaze plots were generated from participants’ eye movements during their review of the Basic Notice to determine how attention was allocated after the moderator asked this question about limiting contact with the debt collector.

In Round 1, the heat map created from participants’ eye movements after the question was asked shows that participants fixated more on the section that describes the process for requesting the name and address of the original creditor (see Figure 55). Fewer fixations occurred on the text about ceasing communication in the “You Have Rights” box. The gaze plot from Round 1 also demonstrates this visual search behavior (see Figure 56).

Participants from Round 2 fixated more on the “How can you dispute the debt?” and “What else can you do?” sections when responding to this question. The example gaze plot from Round 2 shows a participant who visually examined both the “What else can you do?” and “How do you want to respond to this notice?” sections (see Figure 58). Participants from Round 3 fixated on the “What else can you do?” section, but fixated more on the “How do you want to respond to this notice?” section (see Figures 59 and 60).

Eye-tracking data from the three rounds suggests that it was not more difficult to find the cease communication language after it was moved from the right-side bar to the body of the notice after Round 1.

Round 1 Heat Map: “If you wanted the debt collector to stop or limit contact with you, what could you do?”

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

**Questions?**  
Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

Reference: 564-345

March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>
ABC Credit has taken over the account, so now you owe ABC Credit.	

**Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.

Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**How do you want to respond to this notice?**

Check all that apply:

I think your information is incorrect because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:  
Please make your check payable to North South Group and include the reference number 564-345.

**Questions? Call (800) 123-4567**

Figure 55. This heat map is a compilation of all eye fixations from participants tested in Round 1 ( $n = 10$ ) that occurred after the moderator asked, “If you wanted the debt collector to stop or limit contact with you, what could you do?” Participants fixated mostly on the section that describes how the consumer can receive the name and address of the original creditor, as well as the “You Have Rights” section.

Round 1 Gaze Plot: “If you wanted the debt collector to stop or limit contact with you, what could you do?”

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions?**  
Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

Reference: 564-345

March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit.**  
**We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

---

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00

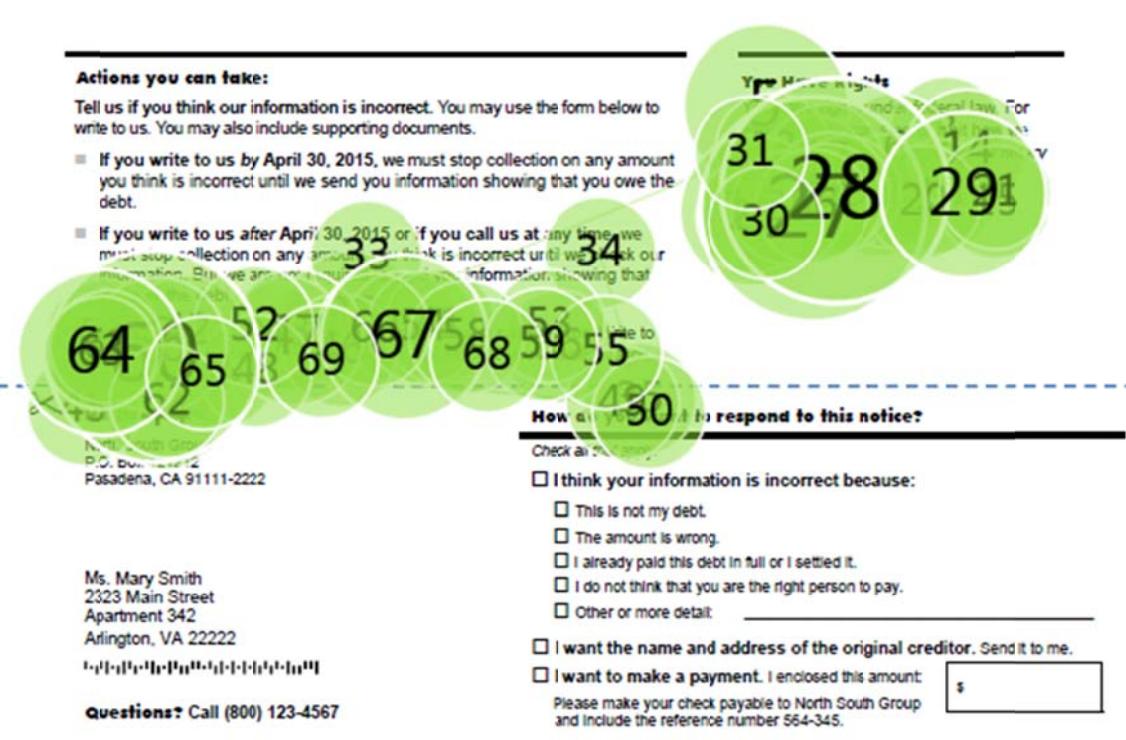
**Total amount of the debt now:**  
ABC Credit has taken over the account, so now you owe \$ 1,409.56  
ABC Credit.

---

**Actions you can take:**

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.



North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222

**Questions?** Call (800) 123-4567

**How to respond to this notice?**

Check all that apply:

I think your information is incorrect because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount: \$ \_\_\_\_\_  
Please make your check payable to North South Group and include the reference number 564-345.

Figure 56. This gaze plot shows a participant who first fixated on the “You Have Rights” section and then on the section that describes how the consumer can receive the name and address of the original creditor.

Round 2 Heat Map: “If you wanted the debt collector to stop or limit contact with you, what could you do?”

<p>North South Group P.O. Box 121212 Pasadena, CA 91111-2222 (800) 123-4567 from 8am to 8pm EST, Monday to Saturday <a href="http://www.nsgrp.com">www.nsgrp.com</a></p> <p>April 15, 2015</p> <p><b>North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.</b></p> <hr/> <p><b>Our information shows:</b> You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 30%;">As of January 2, 2009, you owed:</td> <td style="text-align: right;">\$ 1,234.56</td> </tr> <tr> <td>Between January 2, 2009 and today:</td> <td></td> </tr> <tr> <td style="padding-left: 20px;">You were charged this amount in interest</td> <td style="text-align: right;">+ \$ 225.00</td> </tr> <tr> <td style="padding-left: 20px;">You were charged this amount in fees:</td> <td style="text-align: right;">+ \$ 0.00</td> </tr> <tr> <td style="padding-left: 20px;">You have paid this amount toward the debt:</td> <td style="text-align: right;">- \$ 50.00</td> </tr> <tr> <td><b>Total amount of the debt now:</b></td> <td style="text-align: right;"><b>\$ 1,409.56</b></td> </tr> </table> <hr/> <p><b>How can you dispute the debt?</b> Write to us by May 15, 2015 to dispute all or part of the debt; if you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt; if you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.</p> <ul style="list-style-type: none"> <li>■ Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.</li> </ul> <p>If we do not hear from you, we will assume that our information is correct.</p> <hr/> <p><b>What else can you do?</b></p> <ul style="list-style-type: none"> <li>■ Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.</li> <li>■ Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed <i>Summary of Rights</i> or go to the Consumer Financial Protection Bureau's website at <a href="http://www.consumerfinance.gov">www.consumerfinance.gov</a>.</li> <li>■ Call us at (800) 123-4567 to talk about your payment options.</li> </ul> <p>----- X-----</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p><b>Mail this form to:</b> North South Group P.O. Box 121212 Pasadena, CA 91111-2222</p> <p>Ms. Mary Smith 2323 Park Street Apartment 342 Minneapolis, MN 55401</p> <p>123-456-7890-1234567890</p> </td> <td style="width: 50%; vertical-align: top;"> <p><b>How do you want to respond to this notice?</b></p> <p><i>Check all that apply:</i></p> <p><input type="checkbox"/> I want to dispute the debt because:</p> <p><input type="checkbox"/> This is not my debt. <input type="checkbox"/> The amount is wrong. <input type="checkbox"/> I already paid this debt in full or I settled it. <input type="checkbox"/> I do not think that you are the right person to pay. <input type="checkbox"/> Other or more detail: _____</p> <p><input type="checkbox"/> I want you to send me the name and address of the original creditor.</p> <p><input type="checkbox"/> I enclosed this amount: \$ _____ Make your check payable to North South Group. Include the reference number 564-345.</p> </td> </tr> </table>	As of January 2, 2009, you owed:	\$ 1,234.56	Between January 2, 2009 and today:		You were charged this amount in interest	+ \$ 225.00	You were charged this amount in fees:	+ \$ 0.00	You have paid this amount toward the debt:	- \$ 50.00	<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>	<p><b>Mail this form to:</b> North South Group P.O. Box 121212 Pasadena, CA 91111-2222</p> <p>Ms. Mary Smith 2323 Park Street Apartment 342 Minneapolis, MN 55401</p> <p>123-456-7890-1234567890</p>	<p><b>How do you want to respond to this notice?</b></p> <p><i>Check all that apply:</i></p> <p><input type="checkbox"/> I want to dispute the debt because:</p> <p><input type="checkbox"/> This is not my debt. <input type="checkbox"/> The amount is wrong. <input type="checkbox"/> I already paid this debt in full or I settled it. <input type="checkbox"/> I do not think that you are the right person to pay. <input type="checkbox"/> Other or more detail: _____</p> <p><input type="checkbox"/> I want you to send me the name and address of the original creditor.</p> <p><input type="checkbox"/> I enclosed this amount: \$ _____ Make your check payable to North South Group. Include the reference number 564-345.</p>	<p>To: Ms. Mary Smith 2323 Park Street Apartment 342 Minneapolis, MN 55401</p> <p>Reference: 564-345</p>
As of January 2, 2009, you owed:	\$ 1,234.56														
Between January 2, 2009 and today:															
You were charged this amount in interest	+ \$ 225.00														
You were charged this amount in fees:	+ \$ 0.00														
You have paid this amount toward the debt:	- \$ 50.00														
<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>														
<p><b>Mail this form to:</b> North South Group P.O. Box 121212 Pasadena, CA 91111-2222</p> <p>Ms. Mary Smith 2323 Park Street Apartment 342 Minneapolis, MN 55401</p> <p>123-456-7890-1234567890</p>	<p><b>How do you want to respond to this notice?</b></p> <p><i>Check all that apply:</i></p> <p><input type="checkbox"/> I want to dispute the debt because:</p> <p><input type="checkbox"/> This is not my debt. <input type="checkbox"/> The amount is wrong. <input type="checkbox"/> I already paid this debt in full or I settled it. <input type="checkbox"/> I do not think that you are the right person to pay. <input type="checkbox"/> Other or more detail: _____</p> <p><input type="checkbox"/> I want you to send me the name and address of the original creditor.</p> <p><input type="checkbox"/> I enclosed this amount: \$ _____ Make your check payable to North South Group. Include the reference number 564-345.</p>														

Figure 57. This heat map is a compilation of all eye fixations from participants tested in Round 2 ( $n = 7$ ) that occurred after the moderator asked the question, “If you wanted the debt collector to stop or limit contact with you, what could you do?” Participants fixated mostly on a combination of the “How else can you dispute the debt?” and “What else can you do?” sections.

Round 2 Gaze Plot: "If you wanted the debt collector to stop or limit contact with you, what could you do?"

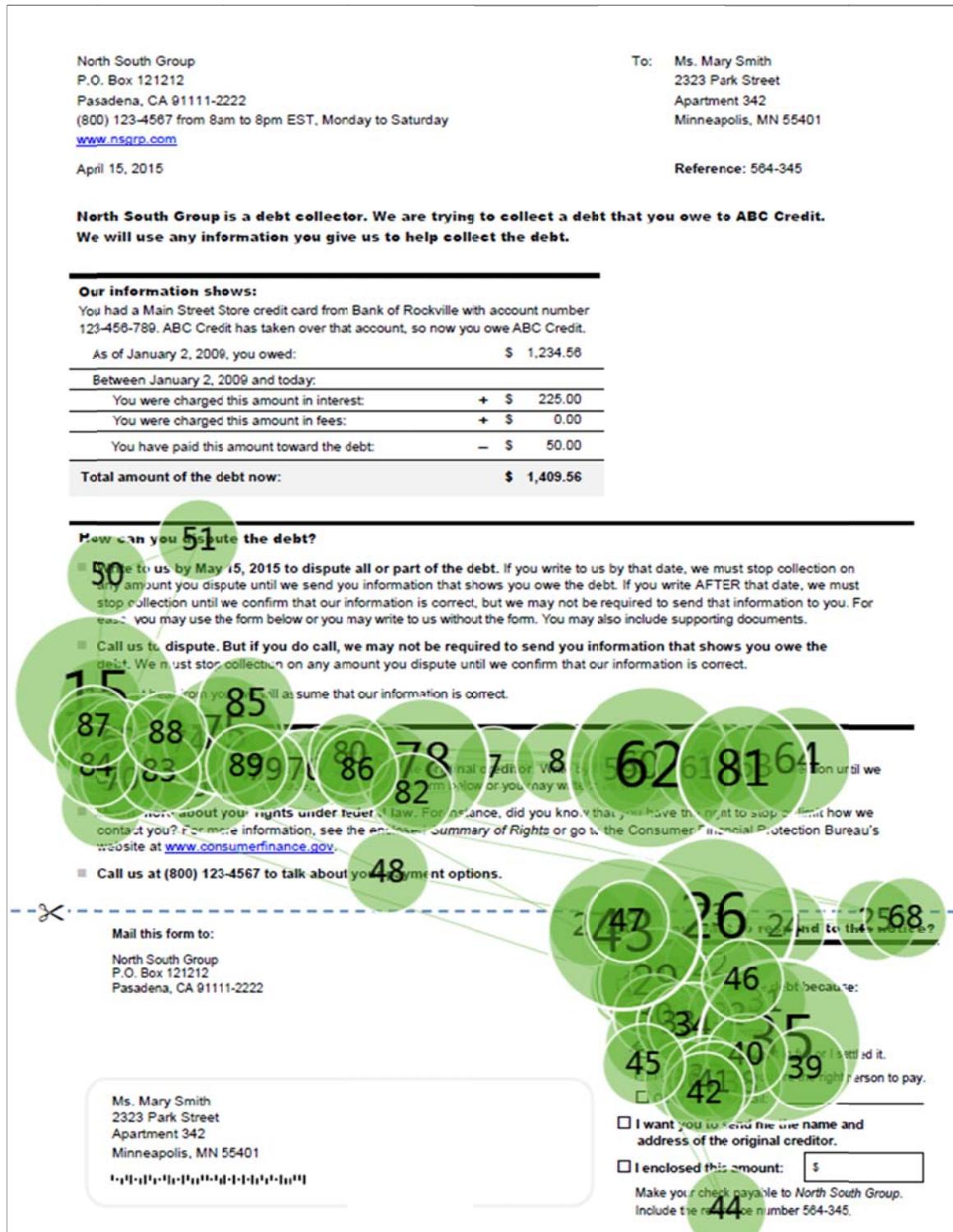


Figure 58. This gaze plot shows a participant who first fixated primarily on the "What else can you do?" and "How do you want to respond to this notice?" sections.

Round 3 Heat Map: “If you wanted the debt collector to stop or limit contact with you, what could you do?”

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

April 27, 2015 Reference: 564-345

**[North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.]**

**Our information shows:**  
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,284.56

**How can you dispute the debt?**

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

**How do you want to respond to this notice?**

Check all that apply.

I want to dispute the debt because I think:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 You are not the right person to pay.  
 Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_  
Make your check payable to North South Group.  
Include the reference number 564-345.

Figure 59. This heat map is a compilation of all eye fixations from participants tested in Round 3 ( $n = 8$ ) that occurred after the moderator asked, “If you wanted the debt collector to stop or limit contact with you, what could you do?” Participants fixated on the “How else can you dispute the debt?”, “What else can you do?”, and “How do you want to respond to this notice?” sections.

Round 3 Gaze Plot: "If you wanted the debt collector to stop or limit contact with you, what could you do?"

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 555-5555 from 8am to 8pm EST Monday through Saturday  
[www.nsg.com](http://www.nsg.com)

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109  
Reference: 554-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

**Our information shows:**  
You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,284.56</b>

**How can you dispute the debt?**

21 Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.

22 20 days to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we receive the information by 21, we will assume that our information is correct.

23 26 39 41 42 38 39 40 31 15 22 32 34 36 37 38 39 40 31 32 34 36 37

Learn more about your rights under federal law. For example, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).

43 ■ Contact us about your payment options.

**How do you want to respond to this notice?**

Check all that apply:

I dispute the debt because I think:  
54 51 56 48 52 51 58

I want you to contact me again at \_\_\_\_\_  
57

I enclosed this amount: \$ \_\_\_\_\_  
57  
Make your check payable to North South Group.  
Include the reference number 554-345.

Mall this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Figure 60. This gaze plot shows a participant who fixated primarily on the "What else can you do?" and "How do you want to respond to this notice?" sections.

The notices tested in Round 1 contained a “You Have Rights” box on the right side of the page, which explained two ways that consumers could find additional information. In Round 1, after participants had reviewed the Basic Notice, they were shown a second notice with the Alternative Cease Communication language, which consisted of additional information in the “You Have Rights” box on the right side of the form see Figures 61 and 62).

#### Round 1: “You Have Rights” Section from Basic and Alternative Cease Communication Language Form

##### Round 1: Alternative Cease Communication

<p><b>Round 1: Basic Form</b></p> <p><b>You Have Rights</b></p> <p>1 You have rights under federal law. For example, you can stop or limit how we contact you. See the enclosed <i>Summary of Rights</i> or go to <a href="http://www.consumerfinance.gov">www.consumerfinance.gov</a> for more information.</p>	<p><b>You Have Rights</b></p> <p>2 You have the right to stop us from contacting you or to limit our contact. You can tell us to not contact you at a particular time or place. For example, you may tell us to not call you at work. If you write to tell us to stop contacting you, we must stop. But you will still owe the debt. In certain circumstances, we may follow up. For more information about your rights, see the enclosed <i>Summary of Rights</i> or go to <a href="http://www.consumerfinance.gov">www.consumerfinance.gov</a> for more information.</p> <p>3</p> <p>4</p> <p>5</p>
--	---

Figure 61.

- 1 Removed “You have rights under federal law.”
- 2 Changed “For example, you can stop or limit how we contact you.” to “You have the right to stop us from contacting you or to limit our contact. You can tell us not to contact you at a particular time or place.”
- 3 Added an additional cease communication example: “For example, you may tell us to not call you at work.”
- 4 Added an additional right: “If you write to tell us to stop contacting you, we must stop. But you will still owe the debt. In certain circumstances, we may follow up.”
- 5 Added “For more information about your rights,”

Figure 62.

The moderator then asked the participants questions to evaluate whether the new language accomplished the same goal as the cease communication language in the Basic Notice, and whether the additional language was likely to influence participant behavior. The moderator asked, “If you wanted the debt collector to stop or limit contact with you, what could you do?” Participants gave similar responses when reviewing each of the notices, suggesting that both versions of the cease communication language clearly conveyed that the consumer has the right to stop or limit contact.

See Figure 63 for the complete distribution of responses to this question.

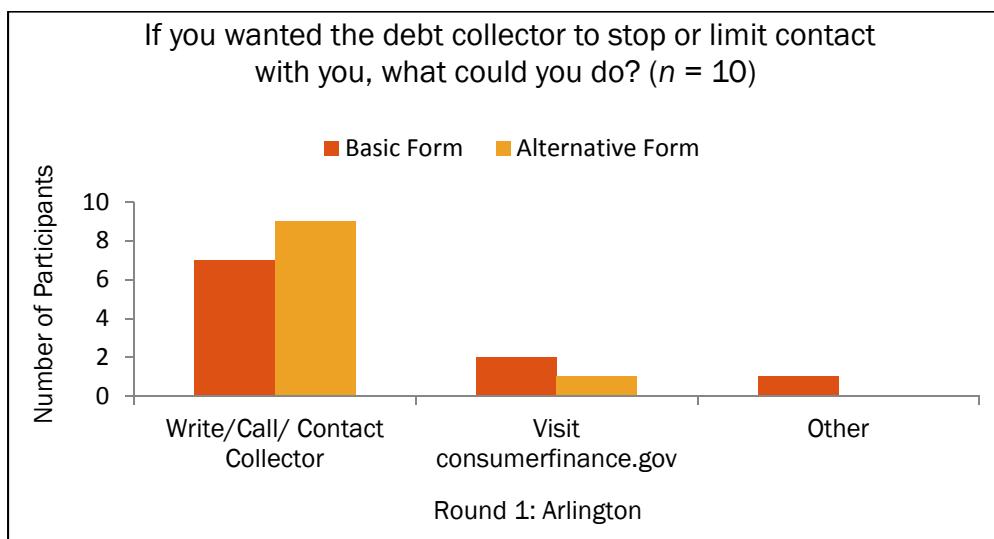


Figure 63.

Participants' preferences were mixed for the Cease Communication language. Some participants commented that they preferred the longer Alternative Cease Communication language. For example, one participant said, "The more information, the better. It gives you examples, it's more detailed." Another participant said, "The second [Alternative Cease Communication notice] has more detail. I prefer the second one. You have rights and should get more information and more detail." However, other participants didn't comment about their preference or preferred the shorter Cease Communication language. Because the Alternative Cease Communication language seemed to provide little additional benefit above the standard Cease Communication language, the standard language was used in Rounds 2 and 3. Further, because Round 1 participants' comments suggested that they did not read the information in the "You Have Rights" box during their first read-through of the form, this language was moved to the more action-oriented "What else can you do?" section for Rounds 2 and 3.

## 9.0 Alternative Dispute Language

In Rounds 2 and 3, after participants had reviewed the Basic Notice, they were shown a second notice with the Alternative Dispute language (see Figure 64). This alternative language consisted of a simplified "How can you dispute the debt?" section that did not distinguish between written and oral disputes or by disputes received by a certain date. The moderator pointed participants to the difference in the language between the two notices.

#### **How can you dispute the debt?**

**Write or call us to dispute all or part of the debt.** We must stop collection on any amount you dispute until we send you information that shows you owe the debt. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents. If we do not hear from you, we will assume that our information is correct.

**Figure 64. Rounds 2 and 3: Alternative Dispute Language**

After reviewing the Alternative Dispute language, participants were asked if they could dispute the debt. All participants in Rounds 2 and 3 were able to identify that they could dispute the debt. The moderator also asked participants what would happen if they disputed the debt. All participants said the collector would stop collection until they had provided information about the debt:

- “They would have to stop collections on any amount that you dispute until they send the information that shows that you owe the debt.”
- “What would happen if I disputed the debt? Well, they would stop collection until they sent me information that shows I owe or how much I owe.”
- “It’s very clear that I could write or call. They’re going to stop the collection on any amount that I would dispute.”

Some participants also expressed a preference for the simplified Alternative Dispute language:

- “This is much better for me. It doesn’t tell me about how to do it by a certain day or after a certain date. And it tells me that the collection’s going to stop if I write to you, if I dispute anything of it. I like how they bring—the sentence says, ‘For ease you may use the form below.’ So it’s going to be the choice, I can do a handwritten letter or just use the form.”
- “Yes. And I could dispute it and I don’t feel like there’s a deadline that I have to dispute it by a certain date to just even get any proof that it’s real. You know, it’s fairly clear cut.”

## **10.0 Debt Identification Activity**

In each round of testing, participants were asked to complete a “Debt Identification Activity” in which they were given a short scenario describing a hypothetical consumer and her debt. Participants were then asked whether the debt on the notices they had been shown could be the debt described in the scenario. In Rounds 1 and 2, the scenario was constructed such that the debt described *likely* was the debt shown on the sample notices:

Imagine that Mary Smith opened up a credit card at Main Street Store in February of 2005. She used this card and made payments regularly for years, but in 2008 Mary lost her job and stopped making payments. The last bill that Mary received was on December 1, 2008, and it said that she owed \$1200.56 on account number 123-456-789.

In Round 3, the name of the store involved, the dates, and the amounts owed in the scenario were altered such that the debt described *likely was not* the debt shown on the sample notices:

Imagine that Mary Smith opened up a credit card at Happy's Department Store in February of 2005. She used this card and made payments regularly for years, but in 2012 Mary lost her job and stopped making payments. The last bill that Mary received was on December 1, 2012, and it said that she owed \$975.00 on account number 123-456-789.

Across all rounds of testing, most participants interpreted the notice and the scenario as intended; participants in the first two rounds were more likely to conclude that the debt in the sample notices could be Mary's, while participants in Round 3 were more likely to say it was not, or to be unclear about whether the debt could be Mary's.

**Table 1. Could this notice refer to the debt that we just read about Mary having?**

	Rounds 1 and 2	Round 3
Yes	15	3
No	2	4
Maybe	1	1
Unclear answer	1	3

Participants were also asked which specific elements on the notice made them think that the debt might or might not be Mary's. In Rounds 1 and 2, participants who said that the debt was Mary's cited elements including:

- Matching account numbers.
- Main Street Store was the original creditor in both cases.
- Similar amounts owed.
- A timeframe in the scenario that matched the dates on the notice.

In Round 3, participants who said that the debt might not be Mary's cited elements including:

- The original store mentioned in the scenario was not on the notice.
- The amounts owed were not similar.

- The timeframe for receiving the notice and for the amounts owed indicated on the notice did not appear to match.

This indicates that participants looked at certain key elements—including creditors, debt amounts, and debt timeframes—to determine whether a debt could belong to a specific consumer.

## 11.0 Time-Barred Debt

The Basic Notices shown to participants at the start of each session did not include any reference to time-barred (i.e., debts for which the applicable statute of limitations has run) or obsolete (i.e., debts that are generally too old to appear on a consumer report) debt. Rather, at the end of each session, participants were shown two additional notices that included variants on time-barred and obsolete debt language. Participants were shown one version of the notice with time-barred debt information and the moderator asked them questions about it. After responding to those questions, participants were shown a second version of the notice with alternative time-barred debt information. The moderator then proceeded to ask the same questions as before about this notice with alternative language. Because participants saw one version of the notice, answered questions, and then saw an alternative version of the notice, it should be noted that participants' experience with the first version might have biased their opinions on the second.

### Round 1

In Round 1, this information appeared on the right side of the form, under a heading reading “You Should Know.” One version tested (Version 1) indicated that the debt was time-barred but not obsolete, and that participants could not be sued on the debt. Another version (Version 2) similarly indicated that the debt was time-barred but not obsolete; however, unlike the first version, it also referenced the possibility that the debt could be revived (i.e., the possibility that the statute of limitations could restart if the consumer makes a payment or acknowledges the debt). See Figure 65.

**You Should Know**

Because of the age of this debt, we cannot sue you for it. But we can report the debt to credit reporting agencies.

**You Should Know**

Because of the age of this debt, we cannot sue you for it unless you make a payment or acknowledge it in writing. But we can report the debt to credit reporting agencies.

Figure 65. Round 1: Two versions of the “You Should Know” section. Version 1 (left) of the “You Should Know” states that consumers could not be sued while Version 2 (right) states that consumers could be sued if a payment is made or the debt is acknowledged in writing.

For each version, respondents were asked questions to test the clarity of the information. The moderator first asked participants, “Based on the information in this notice, can you be sued on this debt?” When presented with the validation notice with Version 1 of the “You Should Know” section, all participants in Round 1 said that they could not be sued.

Participants made comments that suggested they overwhelmingly understood that they could not be sued and seemed very certain in their answer. For example, one participant said, “Because it’s too old maybe they cannot sue you, maybe you don’t have to pay it.” Similarly another participant said, “Nope, you can’t be sued because it’s too old.” After being presented with the validation notice with Version 2 of the “You Should Know” section, nine of the 10 participants said that they could be sued. Some participants qualified this and explained that they could be sued only if they made a payment or acknowledged the debt in writing. For example, one participant said, “I can be sued if I make a payment or acknowledge the debt in writing.” Other participants simply responded that they could be sued and did not clarify their response about whether that was dependent on making a payment or acknowledging it in writing.

For each version, the moderator next asked, “If you made a partial payment on the debt, what could happen? Could the collector sue you?” When reviewing Version 1, nine of the 10 participants said that they could not be sued. The remaining participant said that she was not sure. When reviewing Version 2, all participants responded that they could be sued on the debt *if* a partial payment is made. One participant said, “Yes, I could be sued. I would think that the payment I would make would signal that I’m attempting to pay it off and working with the collection agency.” Despite responding that the information in this section explained that they could be sued if a partial payment was made, some participants were confused as to why the debt would be revived. Participants often hesitated or seemed uncertain when providing this answer, which might have been due to their disbelief that making a payment could open them to being sued.

For each version, the moderator next asked participants, “If you wrote the collector and said you owed the debt, what could happen? Could the collector sue you?” When reviewing Version 1, nearly all participants said that they could not be sued. When reviewing Version 2, all participants responded that they could be sued on the debt *if* they acknowledged in

writing that they owed the debt. One participant said, “Writing would open me up to legal action, but not doing anything would be better. If you pay a little or acknowledge it, you will get sued.” When reviewing Version 2, some participants also made comments that suggested they understood the explanation that they could be sued if they acknowledged the debt in writing, but were confused as to why the debt would be revived and whether this information was accurate. Participants often hesitated or seemed uncertain when providing this answer, which might have been due to their disbelief that acknowledging in writing could open them to being sued. One participant said, “‘Acknowledge’ means admitting I owe the debt, that’s confusing. I’m not sure whether I should pay the full amount or partial amount.” Similarly, another participant said, “I won’t pay it or acknowledge it. Then they won’t sue me. I’d be less likely to pay them or contact them.” At least one participant was uncertain whether disputing the debt would qualify as acknowledging the debt in writing.

For each version, the moderator next asked participants, “Can the debt appear on your credit report?” Regardless of which notice was reviewed, all participants said that the debt could appear on their credit report. For example, one participant said, “At this point I can’t stop them from reporting the credit to a bureau, so what else can you do?”

The moderator concluded this line of questioning by asking, “Does knowing this additional information change how you might respond to the notice?” When reviewing Version 1, four participants out of 10 said that it would change how they might respond to the notice. One of these participants said, “Yes, I guess it would be a more urgent matter to me knowing that even if they can’t sue, I wouldn’t want it to affect my credit score. I don’t want it to affect getting a house, loan, etc.” Four participants said that knowing this additional information would not change how they would respond to the notice. One participant was unsure whether this additional information would change how they might respond, and another participant was not asked. When reviewing Version 2, five participants out of 10 said that the additional information would change how they might respond to the notice. One of these participants said, “If you were unsure of how to respond, it would change because if you make a payment or acknowledge the debt you’ll be sued.” Similarly, another participant said, “I won’t pay it or acknowledge it. Then they won’t sue me. I’d be less likely to pay them or contact them.” Four participants said that it would not change how they might respond to the notice, and one participant was unsure (see Figures 66 and 67).

"Does knowing this additional information change how you might respond to the notice?"  
(n = 10)  
Version 1

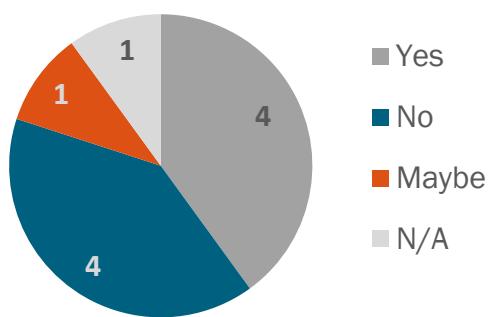


Figure 66.

"Does knowing this additional information change how you might respond to the notice?"  
(n = 10)  
Version 2

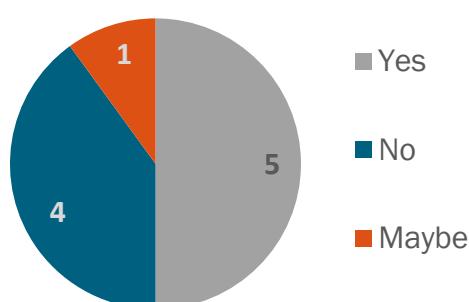


Figure 67.

## Round 2

In Round 2, statements about time-barred debt were moved next to the amount due and the language was modified slightly. In this round, all debts were considered obsolete; one version of the language included revival information and one did not. As with Round 1, participants were shown one version of the notice with time-barred debt information and the moderator asked questions about it. After responding to those questions, participants were shown a second version of the notice with alternative time-barred debt information. The moderator then proceeded to ask the same questions as before about this notice with alternative language. Because participants saw one version of the notice, answered questions, and then saw an alternative version of the notice, their experience with the first version might have biased their opinions of the second. This potential bias should be taken into account when interpreting the results (see Figure 68).

Because of the age of this debt, we cannot sue you for it and the debt cannot appear on your credit report.

Because of the age of this debt, we can sue you for it only if you make a payment or acknowledge it in writing. And the debt cannot appear on your credit report.

Figure 68. Round 2: Two versions of "time-barred" language tested. Version 1 (left) of the "You Should Know" box states that consumers could not be sued while Version 2 (right) states that consumers could be sued if a payment is made or the debt is acknowledged in writing.

For each version of the notice, respondents were asked questions to test the clarity of the information. The moderator first asked participants, "Based on the information in this notice,

can you be sued on this debt?" After reviewing Version 1, all nine participants in Round 2 said that they could not be sued. One participant said, "Well, because this, the letter, is dated 2015 and this debt is from 2009, January 2, 2009, so because of the age of this debt, we cannot sue you for it." Similarly, another participant said, "According to this, no. There [are] no circumstances that they can sue you. In fact, honestly, this statement alone, you know if basically I could, that one sentence gives me *carte blanche* to ignore this completely." After reviewing Version 2, all nine participants said that they could be sued. Some participants qualified this statement and explained that they could only be sued if they made a payment or acknowledged it in writing. For example, one participant said, "Yes. If I acknowledge in writing that it's mine. One of the ways I could acknowledge in writing that it's mine is by making a payment towards it." Other participants simply responded that they could be sued and did not clarify their response about whether that was dependent on making a payment or acknowledging it in writing.

For each version of the notice, the moderator next asked, "If you made a partial payment on the debt, what could happen? Could the collector sue you?" While reviewing Version 1, three of the seven participants who were asked this question said that they could not be sued. The other four participants made comments that suggested that they were uncertain if they could be sued if they made a partial payment. One of these participants who was uncertain said, "You know what, I honestly have no idea, I see both sides there because if you're paying them for debt that they purchased off a third party, an old debt pile sitting out there, you made a payment to them I don't know that that would activate it." When reviewing Version 2, all participants responded that they could be sued on the debt *if* a partial payment is made.

For each version of the notice, the moderator next asked, "If you wrote the collector and said you owed the debt, what could happen? Could the collector sue you?" When reviewing Version 1, seven of the nine participants said that they could not be sued and two participants were unsure. When reviewing Version 2, all participants responded that they could be sued on the debt *if* they acknowledged the debt in writing. One participant said, "They could sue me by acknowledging that I owed the debt."

For each version of the notice, the moderator next asked, "Can the debt appear on your credit report?" When reviewing Version 1, eight of the nine participants said that the debt could not appear on their credit report. The other participant was unsure, and seemed to doubt the credibility of the information by saying, "It says it can't but I don't find that to be realistic. Just due to my knowledge of credit reports and my work." When reviewing Version 2, eight of the nine participants responded that the debt could not appear on their credit report. The other participant was unsure and said, "It can but I guess I'm a little unclear if I write or acknowledge it, then can it appear on my credit report?"

For each version of the notice, the moderator concluded this line of questioning by asking, “Does knowing this additional information change how you might respond to the notice?” When reviewing Version 1, six participants said that it would change how they might respond to the notice and that they would be less likely to make payments. One of these participants said, “Yeah. I would, honestly, I would probably just ignore it. Because according to this they cannot do anything on my credit report and they cannot sue me. So what else are they going to do?” Three participants explained that knowing this additional information would not change how they would respond to the notice but that they thought it would change how other people would respond. When reviewing Version 2, six participants out of nine said that the additional information would change how they might respond to the notice and they would be less likely to make payments. One of the six participants said, “Yes, if I understand that sentence correctly, I don’t want to do anything where they could end up suing me.” The other three participants said that the information would not change how they would respond to the notice and that they would still make payments on the debt (see Figures 69 and 70).

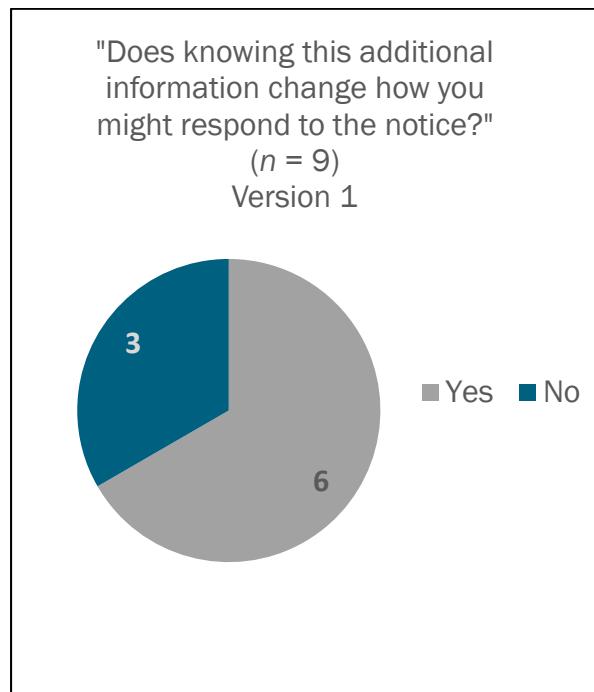


Figure 69.

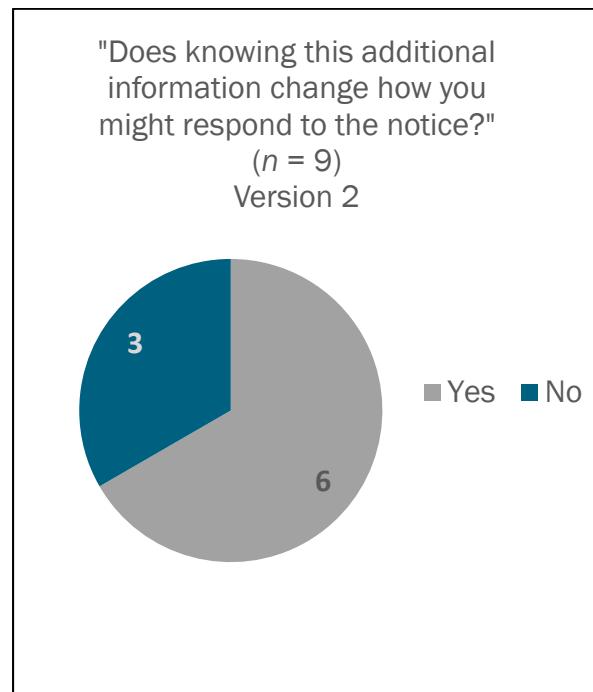


Figure 70.

Participants also expressed doubt as to how the revival language could be accurate and discussed how it caused confusion. For example, one participant said, “Why would you sue me if I was making my payments and acknowledging my debt? I think, to me in my mind, it would be the other way around. If you’re not acknowledging your debt, you’re not making payments, we’re going to take the legal course of action to secure our money. But if you’re going to sue me for making my payments, no. That’s going to make me very, very, very nervous before I make a payment.” Another participant said, “The more I read it, it just sounds more confusing to me. The last notice that I read it sounded more direct. That first

sentence, ‘unless you make a payment or acknowledge,’ just makes me wonder at what point they would or wouldn’t sue me. I think it’s good that it notes they can report it to credit agencies, that’s good to know. But if I wanted more explanation, I would want them to say specifically what would happen if I make a payment or acknowledge it in writing. I’m sure those consequences are different for both those cases.”

Participants’ comments in this round also suggested that it was unclear what constituted acknowledging in writing. For example, one participant was unsure if speaking to the debt collector constituted acknowledgement, saying, “If I did want to actually contact them and talk to them about it, I would assume by this right here that they couldn’t pursue it any further than just the conversation I had with them. Although I really wouldn’t know that for sure, so I may not even pursue a call, having read this.” The uncertainty about the revival language prompted one participant to discuss his desire to visit consumerfinance.gov. This participant said, “What I would probably do is would go to that consumerfinance.gov and reread and see what the statutes are on that.”

### Round 3

In Round 3, statements about time-barred debt remained immediately next to the amount due. In this round, all debts featured the possibility of revival; one version of the language indicated that the debt was obsolete and one did not (see Figure 71).



Figure 71. Round 3: Two versions of “time-barred” language tested. Version 1 (left) of the “You Should Know” box states that the debt could appear on the consumer’s credit report (obsolete) while Version 2 (right) states that the debt could be reported to the credit reporting agencies (not obsolete).

As in previous rounds, for each version, participants were asked, “Based on the information in this notice, can you be sued on this debt?” For both forms, all participants said that they could be sued. The moderator asked the follow-up question, “Under what circumstances can you be sued?” All participants commented that they could be sued if they made a partial payment or acknowledged the debt in writing. One participant expressed confusion about the possibility of being sued if a payment was made or the debt was acknowledged in writing. This participant said, “I’m a little confused of what they’re saying. ‘Cause it’s almost saying that if you don’t make a payment towards it or acknowledge that it’s yours in writing, that they can’t sue you? That’s the first time where I think I had seen that.” Another participant explained that you could be penalized regardless of whether you made a payment or acknowledged in writing. This participant said, “But if you don’t contact them, they’re going to assume that your information is correct anyway, which you not responding gives them agreement that the account is yours. And if you contact them, you give them

agreement that the account is yours.” Yet another participant seemed convinced the word “can” actually meant “will”.

Two participants interpreted the revival language as threatening. One participant said, “I mean, when people are pretty much threatening you, you know, you’re trying to be good, you make any kind of payment you can and they’re all threatening to sue you. So why do you want to give them anything?” The other participant said, “It’s a threat that’s being made because the original date, I guess, of delinquency.”

The moderator also asked about what constituted “acknowledge in writing.” Participants gave varying responses. Seven participants discussed whether using the tear-off portion of the form would constitute acknowledging the debt in writing, saying:

- “If you cut off the bottom and sent it? Yeah, that would be acknowledging it.”
- “Wow, that’s a good question, because that could be a trick thing. Well, I guess if you write in more detail [on the tear-off], I guess you’re writing to them. I don’t know if checking a box is the same thing.”
- “Well it all depends. That’s something you might have to inquire to Consumer Finance. That would probably be my next step. If checking a box is considered writing. To me it’s not, but you never know. That’s why I’d have to inquire with Consumer Finance.”
- “So if I checked off the amount, ‘this is not my debt,’ I’m still acknowledging this paper, I guess. It’s a little confusing.”
- “That’s like a trick question. Cause you’re acknowledging that they’re saying you have a debt, but you’re not acknowledging it as your own debt.”
- “If I were to check the box that said, ‘This is not my debt’ and submitted it in from the bottom half of the form, I would automatically assume that because they aided the debt that they would still be able to sue me because I acknowledged it in writing.”
- “I’m not sure about the—if you ask them to send you information about the original creditor. That one’s unclear.”

When asked the question, “Does knowing this additional information change how you might respond to the notice?”, one participant explained, “Well, the first, maybe the first thing I would probably do is go to the website, consumerfinance.gov, and look at all the rights and learn more about it.” Another participant responding to this same question said, “Consumerfinance.gov, probably so much information there. Just thinking about how much information people ignore on the letters like this. It’s always there. Most of the time it’s in the back of the page or there’s several pages, in the tiny writing cause they know that you ignore it. But it’s probably the law that they have to put it on there. The most important thing—a lot of things—that’s in tiny writing or spoken so fast at the end of a commercial. That’s the important stuff.”

The moderator next asked, “Can the debt appear on your credit report?” When reviewing Version 1, participants explained that their debt could not appear on a credit report in most cases. But different participants interpreted the phrase “most cases” differently and some expressed confusion about what the phrase meant in this situation. Some participants explained that they would probably be the case where the debt would be reported to a credit bureau. These comments include:

- “Most cases, most, most. Most is more than not.”
- “In most cases, but who knows if this is most cases.”
- “I will probably be in that few cases that it does appear on my credit report. ‘Cause they probably just throw in ‘in most cases,’ I don’t know, just to throw you off or make you think that it’s not gonna appear on your credit report, so you have no worries. But like I said, I’d probably be in that few that it does appear on the credit report, if in fact it is true that in most cases it doesn’t appear on the credit report.”

When reviewing Version 2, 10 of the 11 participants said that the debt could appear on their credit report. One participant’s comments suggested that she thought the possibility of credit reporting was tied to whether she made a payment or acknowledged the debt in writing. This participant said, “If you make a payment. That’s really bad. Pretty much if you make a payment you’re guilty and you’re saying you owe the debt. And then they can report it to the credit agencies. That’s like I’ve always heard if you don’t make a payment for seven whole years, not one payment on anything, legally you don’t owe that debt at all.”

The moderator next asked participants, “Does knowing this additional information change how you might respond to this notice?” When viewing Version 1, 10 of the 11 participants explained that it would change how they might respond to the notice, typically focusing on the revival language when responding to the question. Nine of these 10 participants explained that they would be less likely to make a payment. Examples of these participants’ statements include:

- “Yes, because they’re talking about you can sue if you’re acknowledging it or making payments. And I feel like if I’m acknowledging it, I’m calling you to try and work something out, that that’s kind of intimidating and it makes you not want to contact them at all.”
- “Less [likely to make a payment] if I didn’t have the money. Most people that have these just don’t have the money and are in a bad situation.”
- “Because of the age of the debt, I open the door for them to sue me if I make a payment.”

When participants reviewed Version 2, nine of the 10 participants who were asked this question said that, as with Version 1, knowing this information would change how they might respond to the notice. One participant indicated that he/she would be less likely to make a

payment: “With this [version], I would completely, you know, 100% ignore it, and never do anything with it.” However, another said the disclosure would make him more likely to make a payment: “I would just get on it quicker, you know, try and work it out, try to find a way, and then probably ask them, you know, what the process is of suing, what that meant.”

## 12.0 Additional Information

The sample validation notices list two resources for additional information about consumer rights: consumerfinance.gov and a separate Summary of Rights that might be included with validation notices when they are sent to consumers in the future, but which was not included in this testing.

During Rounds 1 and 2, the moderator asked questions to assess whether participants would be able to use these elements of the form to locate additional information.

Participants were asked, “What if you wanted more information about debt collection in general?” Eighteen of the 19 participants in Rounds 1 and 2 responded that they could visit consumerfinance.gov for more information. A few participants also mentioned that they could get additional information from the Summary of Rights. For example, one participant said, “The North South group would be providing that Summary of Rights. The rights would stay with you with any creditor.” The Summary of Rights had not yet been created and was not included in the envelope in the scenario; this may have influenced participants’ likelihood of saying they would look to this document for more information. This question was deprioritized in Round 3 to allow for time on other questions. As a follow-up question, the moderator asked some participants, “What would you expect to find at consumerfinance.gov?” Participants generally understood that they would find information that would help to protect them as consumers. For example, participants made the following comments:

- “For consumers that are not sure about their rights concerning collections. It will give them that information and also enhance their knowledge as to what they can do and what they can’t do in regards to that particular collector.”
- “I’m going to guess information to help out consumers.”
- “Your rights of what they can and cannot do, the debt collectors. And what you can do to repair, where they might give you suggestions probably of doing some kind of negotiation or talking—working something out with whoever the debt collector is. They probably give you ways of what to do and what not to do. They probably also tell you why it’s so important to probably pay off your debt for credit score purposes.”

The moderator also asked some participants, “Who do you think runs the site?” All participants who were asked noted the .gov extension and explained that the government runs the site.

Because the Summary of Rights was not included in the envelope for these interviews, some participants were also asked what they would expect to find on the Summary of Rights. Participants generally explained that they would find additional information about their rights as a consumer. For example, participants made the following comments:

- “Probably a little bit more about how they can contact you and what you can do to maybe stop that. You have the right to know all of that original debt maybe information.”
- “I think it gives another way of stopping them from contacting me. It tells me the rights I have as a consumer.”
- “Probably spell out what sort of realistic timeframe I would have to pay down the debt and if I’d be entitled to some sort of payment plan or something.”
- “I would expect to see some of the same things that I’d find at the Consumer Financial Protection Bureau’s website. That I’d have the right to stop this, dispute it, limit the contact with the debt collector.”

During debriefing, the moderator also asked participants, “What questions do you have after reading this [notice]?” A few participants discussed the lack of an accompanying Summary of Rights as a source of potential questions. For example, one participant from Round 1 said, “I’d expect something on the back explaining more about the debt collection process and my rights. More information should come with this notice.” Similarly, another participant said, “I would want to see the Summary of Rights.”

## 13.0 Consequences for Not Responding

To gain a better understanding of consumer perceptions of the consequences of not responding to the notice, the moderator asked participants, “What do you think will happen if you ignore this notice and don’t do anything?” Only two participants made comments that suggested that they were completely uncertain. The other participants made comments that focused on their understanding of their negative consequences of not responding.

Participants typically focused on the possibility of having the debt reported to a credit bureau and/or the accrual of interest and fees, and some mentioned the possibility of being sued. Some participants gave very detailed responses and cited the information on the notice about how the collector would then assume that the information was correct if they did not respond. For example, participants said:

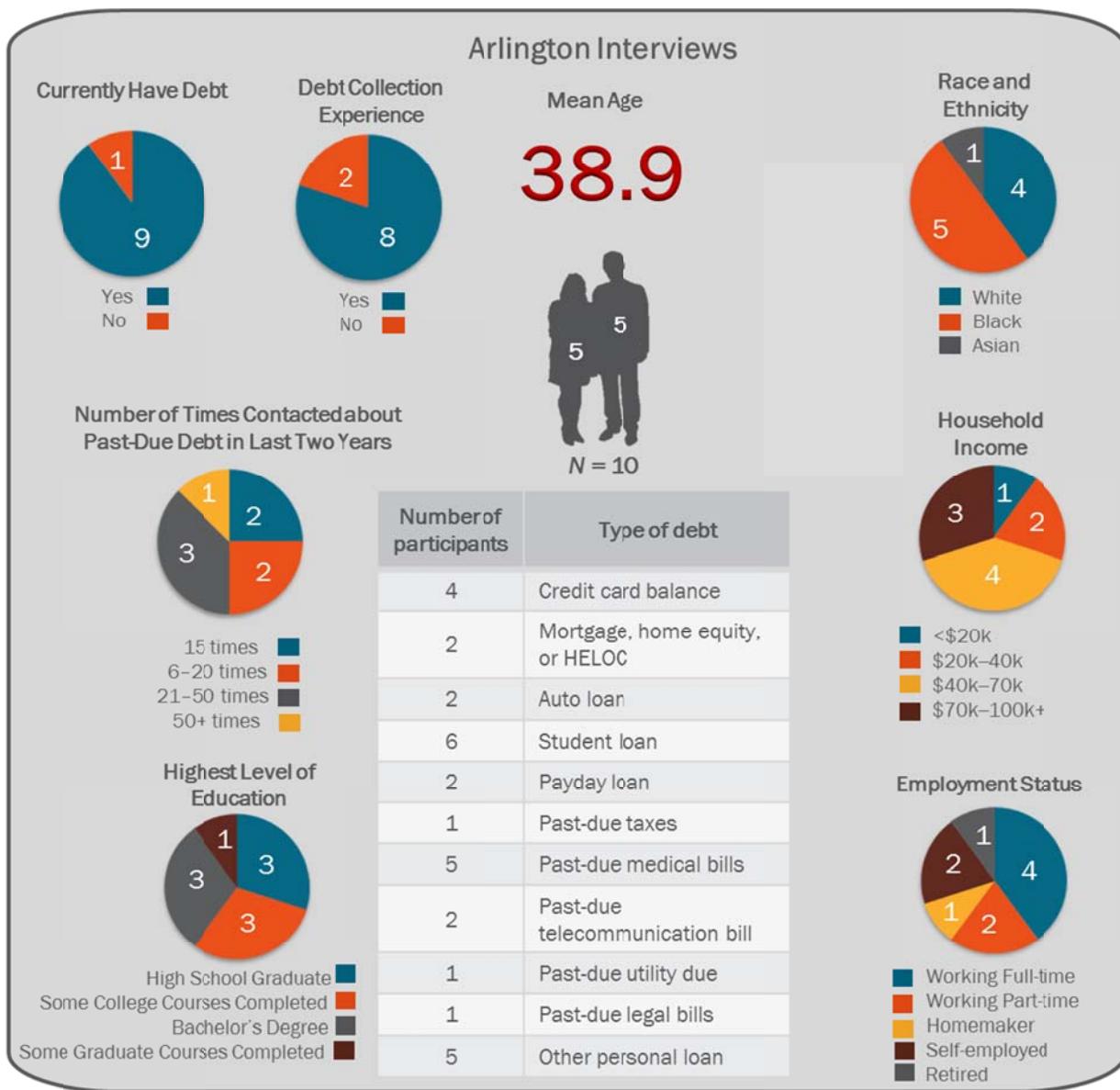
- “They would continue to put interest on it and the collections would continue because it says, ‘If we do not hear from you, we will assume that our information is correct.’”
- “The longer you go without paying, the more interest that’s accumulating.”
- “All types of things can happen. It’s a possibility you can get sued. Start taking collections from your paycheck, bank account. And just a lower and lower credit score.”
- “‘If we do not hear from you, we will assume that our information is correct.’ And they would probably continue to keep adding interest, fees, and whatever else they wanna add.”
- “It would affect my credit report and stay on my file. And destroy everything. It will lower my credit score.”

Participants also discussed how they would continue to receive notices and calls from the collector if they were nonresponsive. For example, participants said:

- “They would just keep sending letters. And then eventually they tell you it’s gonna be a charge-off.”
- “They’d continue to send notices.”
- “They’d send more notices, they’d call more often.”
- “I bet you’d get another notice with more interest added and, if they had further contact information on me, probably could receive calls.”

The remaining sections of this report provide more detailed information on participant demographics, the forms tested in each round, and the moderator’s guide used in the data collection.

## 14.0 Participant Demographics



## Minneapolis Interviews

Currently Have Debt



Debt Collection Experience



Mean Age

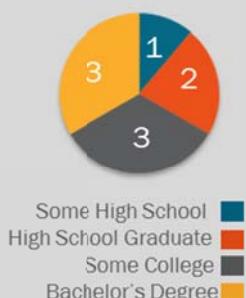
44.5



Number of Times Contacted about Past-Due Debt in Last Two Years



Highest Level of Education



Number of participants

Type of debt

Number of participants	Type of debt
3	Credit card balance
4	Mortgage, home equity, or HELOC
3	Auto loan
5	Student loan
2	Other consumer or personal loan
3	Auto title loan
3	Past-due medical bills

Race and Ethnicity



Household Income

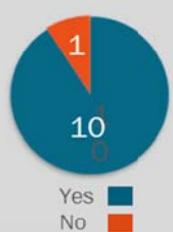


Employment Status



## Las Vegas Interviews

Currently Have Debt



Debt Collection Experience



Mean Age

39.5



*N = 11*

Number of Times Contacted about Past-Due Debt in Last Two Years



1-5 times  
6-20 times  
21-50 times  
50+ times

Highest Level of Education



High School Graduate  
Some College Completed  
Bachelor's Degree

Number of participants

Number of participants	Type of debt
7	Credit card balance
3	Mortgage, home equity, or HELOC
4	Auto loan
4	Student loan
2	Other consumer or personal loan
4	Auto title loan
2	Payday loan
3	Legal expense
2	Past-due taxes
4	Past-due medical bills
1	Past-due telecommunication bill
1	Past-due utility due

Race and Ethnicity



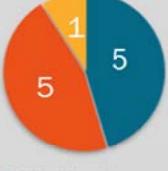
White  
Black  
Hispanic  
Multi-racial

Household Income



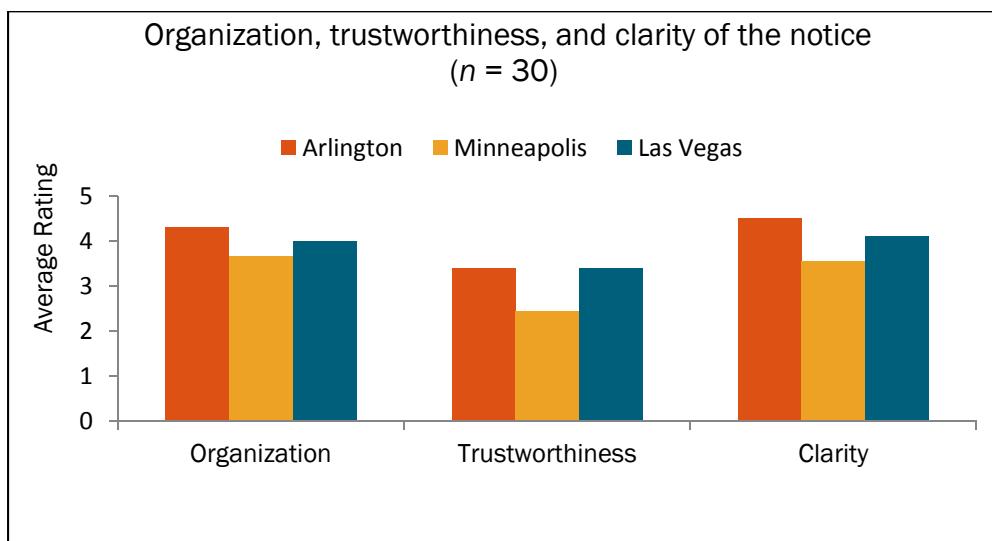
<\$20k  
\$20k-40k  
\$40k-70k  
\$70-100k

Employment Status



Working Full-time  
Working Part-time  
Not Employed

## 15.0 Questionnaire Ratings



1. How organized is the format of this notice?
  - (1) Not at all organized
  - (2) Slightly organized
  - (3) Moderately organized
  - (4) Very organized
  - (5) Extremely organized
  
2. How trustworthy is the information provided in this notice?
  - (1) Not at all trustworthy
  - (2) Slightly trustworthy
  - (3) Moderately trustworthy
  - (4) Very trustworthy
  - (5) Extremely trustworthy
  
3. How clear is the language in the notice?
  - (1) Not at all clear
  - (2) Slightly clear
  - (3) Moderately clear
  - (4) Very clear
  - (5) Extremely clear

## 16.0 Round 1 Notices

### Basic Notice with No “You Should Know” Box

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

**Questions?**

Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 2222

Reference: 564-345

March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit.  
We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect.  
You also have the right to get the name and address of the original creditor.

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville  
with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,409.56</b>
ABC Credit has taken over the account, so now you owe ABC Credit.	

**Actions you can take:**

**Tell us if you think our information is incorrect.** You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

**Tell us if you want the name and address of the original creditor.** Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.



Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222  
123-456-7890

**Questions? Call (800) 123-4567**

**You Have Rights**

You have rights under federal law. For example, you can stop or limit how we contact you. See the enclosed Summary of Rights or go to [www.consumerfinance.gov](http://www.consumerfinance.gov) for more information.

**How do you want to respond to this notice?**

Check all that apply:

- I think your information is incorrect because:

- This is not my debt.
- The amount is wrong.
- I already paid this debt in full or I settled it.
- I do not think that you are the right person to pay.
- Other or more detail: \_\_\_\_\_

- I want the name and address of the original creditor. Send it to me.

- I want to make a payment. I enclosed this amount:

Please make your check payable to North South Group  
and include the reference number 564-345.

\$ \_\_\_\_\_

## Alternative Cease Communication Language

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

### Questions?

Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 2222

Reference: 564-345

March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit.  
We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

### Our information shows:

You had a Main Street Store credit card from Bank of Rockville  
with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	
ABC Credit has taken over the account, so now you owe ABC Credit.	\$ 1,409.56

### Actions you can take:

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.



Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222  
123-456-7890

Questions? Call (800) 123-4567

### You Have Rights

You have the right to stop us from contacting you or to limit our contact. You can tell us to not contact you at a particular time or place. For example, you may tell us to not call you at work. If you write to tell us to stop contacting you, we must stop. But you will still owe the debt. In certain circumstances, we may follow up. For more information about your rights, see the enclosed *Summary of Rights* or go to [www.consumerfinance.gov](http://www.consumerfinance.gov) for more information.

### How do you want to respond to this notice?

Check all that apply:

I think your information is incorrect because:

- This is not my debt.
- The amount is wrong.
- I already paid this debt in full or I settled it.
- I do not think that you are the right person to pay.
- Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:

Please make your check payable to North South Group  
and include the reference number 564-345.

\$ \_\_\_\_\_

## Time-Barred, No Revival, and Not Obsolete

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

### Questions?

Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 2222

Reference: 584-345

March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit.  
We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

#### Our information shows:

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00

#### Total amount of the debt now:

ABC Credit has taken over the account, so now you owe \$ 1,409.56  
ABC Credit.

#### You Should Know

Because of the age of this debt, we cannot sue you for it. But we can report the debt to credit reporting agencies.

#### Actions you can take:

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.

Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222  
123-456-7890

Questions? Call (800) 123-4567

#### How do you want to respond to this notice?

Check all that apply:

I think your information is incorrect because:

- This is not my debt.
- The amount is wrong.
- I already paid this debt in full or I settled it.
- I do not think that you are the right person to pay.
- Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:

Please make your check payable to North South Group  
and include the reference number 584-345.

## Time-Barred, Revival, and Not Obsolete

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

### Questions?

Call (800) 123-4567 from 8am to 8pm, Monday to Saturday  
or go to [www.nsgrp.com](http://www.nsgrp.com)

To: Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 2222

Reference: 564-345

March 31, 2015

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit.  
We will use any information you give us to help collect the debt.**

By law, we must send you the following information. You have the right to tell us if you think this information is incorrect. You also have the right to get the name and address of the original creditor.

### Our information shows:

You had a Main Street Store credit card from Bank of Rockville  
with account number 123-456-789.

As of January 2, 2009, you owed:	\$ 1,234.56
Since then, you were charged this amount in interest:	+ \$ 225.00
And you were charged these fees and other charges:	+ \$ 0.00
And you have paid this amount toward the debt:	- \$ 50.00

### Total amount of the debt now:

ABC Credit has taken over the account, so now you owe ABC Credit.	\$ 1,409.56
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### You Should Know

Because of the age of this debt, we cannot sue you for it unless you make a payment or acknowledge it in writing. But we can report the debt to credit reporting agencies.

### Actions you can take:

Tell us if you think our information is incorrect. You may use the form below to write to us. You may also include supporting documents.

- If you write to us by April 30, 2015, we must stop collection on any amount you think is incorrect until we send you information showing that you owe the debt.
- If you write to us after April 30, 2015 or if you call us at any time, we must stop collection on any amount you think is incorrect until we check our information. But we are not required to send you information showing that you owe the debt.

Tell us if you want the name and address of the original creditor. Write to us by April 30, 2015 and we will stop collection until we send you that information. You may use the form below.



Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Main Street  
Apartment 342  
Arlington, VA 22222  
123-456-7890

Questions? Call (800) 123-4567

### How do you want to respond to this notice?

Check all that apply:

I think your information is incorrect because:

- This is not my debt.
- The amount is wrong.
- I already paid this debt in full or I settled it.
- I do not think that you are the right person to pay.
- Other or more detail: \_\_\_\_\_

I want the name and address of the original creditor. Send it to me.

I want to make a payment. I enclosed this amount:

Please make your check payable to North South Group  
and include the reference number 564-345.

\$ \_\_\_\_\_

## 17.0 Round 2 Notices

## Basic Notice

## Alternative Dispute Language

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 15, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

Reference: 584-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

#### **Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$	1,234.56
Between January 2, 2009 and today:		
You were charged this amount in interest:	+	\$ 225.00
You were charged this amount in fees:	+	\$ 0.00
You have paid this amount toward the debt:	-	\$ 50.00
<b>Total amount of the debt now:</b>		<b>\$ 1,409.56</b>

#### **How can you dispute the debt?**

**Write or call us to dispute all or part of the debt.** We must stop collection on any amount you dispute until we send you information that shows you owe the debt. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents. If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
  - Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
  - Call us at (800) 123-4567 to talk about your payment options.

- 8 -

**Mail this form to:**

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55404

**How do you want to respond to this notice?**

*Check all that apply.*

- I want to dispute the debt because:

  - This is not my debt.
  - The amount is wrong.
  - I already paid this debt in full or I settled it.
  - I do not think that you are the right person to pay.
  - Other or more detail: \_\_\_\_\_

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to *North South Group*.  
Include the reference number 564-345.

## Time-Barred, No Revival, and Obsolete

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 15, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

---

### Our information shows:

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$ 1,234.56
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Between January 2, 2009 and today:	
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You were charged this amount in interest:	+ \$ 225.00
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You were charged this amount in fees:	+ \$ 0.00
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You have paid this amount toward the debt:	- \$ 50.00
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Total amount of the debt now:	\$ 1,409.56
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Because of the age of this debt, we cannot sue you for it and the debt cannot appear on your credit report.

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### How can you dispute the debt?

- Write to us by May 15, 2015 to dispute all or part of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

---

### What else can you do?

- Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Call us at (800) 123-4567 to talk about your payment options.

Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401  
.....

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### How do you want to respond to this notice?

Check all that apply:

- I want to dispute the debt because:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 I do not think that you are the right person to pay.  
 Other or more detail: \_\_\_\_\_
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

## Time-Barred, Revival, and Obsolete

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 15, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

### Our information shows:

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit has taken over that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$ 1,234.56
Between January 2, 2009 and today:	
You were charged this amount in interest:	+ \$ 225.00
You were charged this amount in fees:	+ \$ 0.00
You have paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,409.56

Because of the age of this debt, we can sue you for it only if you make a payment or acknowledge it in writing. And the debt cannot appear on your credit report.

### How can you dispute the debt?

- Write to us by May 15, 2015 to dispute all or part of the debt. If you write to us by that date, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER that date, we must stop collection until we confirm that our information is correct, but we may not be required to send that information to you. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we may not be required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

### What else can you do?

- Ask us to send you the name and address of the original creditor. Write by May 15, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Call us at (800) 123-4567 to talk about your payment options.

Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Minneapolis, MN 55401  
[REDACTED]

### How do you want to respond to this notice?

Check all that apply:

- I want to dispute the debt because:
  - This is not my debt.
  - The amount is wrong.
  - I already paid this debt in full or I settled it.
  - I do not think that you are the right person to pay.
  - Other or more detail: \_\_\_\_\_
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

## 18.0 Round 3 Notices

### Basic Notice

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 27, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

**Our information shows:**

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
<b>Total amount of the debt now:</b>	<b>\$ 1,284.56</b>

**How can you dispute the debt?**

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

**What else can you do?**

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.



Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

**How do you want to respond to this notice?**

Check all that apply:

- I want to dispute the debt because I think:
  - This is not my debt.
  - The amount is wrong.
  - I already paid this debt in full or I settled it.
  - You are not the right person to pay.
  - Other or more detail: \_\_\_\_\_
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

## Alternative Dispute Language

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 27, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**



### Our information shows:

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2013, you owed:	\$ 1,234.56
<hr/>	
Between January 2, 2013 and today:	
You were charged this amount in interest:	+ \$ 75.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,284.56



### How can you dispute the debt?

Write or call us to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents. If we do not hear from you, we will assume that our information is correct.

### What else can you do?

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.



Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

### How do you want to respond to this notice?

Check all that apply:

- I want to dispute the debt because I think:  
 This is not my debt.  
 The amount is wrong.  
 I already paid this debt in full or I settled it.  
 You are not the right person to pay.  
 Other or more detail: \_\_\_\_\_
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

## Time-Barred, Revival, and Not Obsolete

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgrp.com](http://www.nsgrp.com)

April 27, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**

### Our information shows:

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2009, you owed:	\$ 1,234.56
Between January 2, 2009 and today:	
You were charged this amount in interest:	+ \$ 225.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,434.56

Because of the age of this debt, we can sue you for it only if you make a payment or acknowledge it in writing. We can report the debt to credit reporting agencies.

### How can you dispute the debt?

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

### What else can you do?

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed Summary of Rights or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.

Mail this form to:  
North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

### How do you want to respond to this notice?

Check all that apply:

- I want to dispute the debt because I think:
  - This is not my debt.
  - The amount is wrong.
  - I already paid this debt in full or I settled it.
  - You are not the right person to pay.
  - Other or more detail: \_\_\_\_\_
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.

## Time-Barred, Revival, and Obsolete

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222  
(800) 123-4567 from 8am to 8pm EST, Monday to Saturday  
[www.nsgr.com](http://www.nsgr.com)

April 27, 2015

To: Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

Reference: 564-345

**North South Group is a debt collector. We are trying to collect a debt that you owe to ABC Credit. We will use any information you give us to help collect the debt.**



### Our information shows:

You had a Main Street Store credit card from Bank of Rockville with account number 123-456-789. ABC Credit now owns that account, so now you owe ABC Credit.

As of January 2, 2008, you owed:	\$ 1,234.56
Between January 2, 2008 and today:	
You were charged this amount in interest:	+ \$ 225.00
You were charged this amount in fees:	+ \$ 25.00
You paid this amount toward the debt:	- \$ 50.00
Total amount of the debt now:	\$ 1,434.56

Because of the age of this debt, we can sue you for it only if you make a payment or acknowledge it in writing. In most cases, the debt cannot appear on your credit report. □

### How can you dispute the debt?

- Write to us by May 27, 2015 to dispute all or part of the debt. We must stop collection on any amount you dispute until we send you information that shows you owe the debt. If you write AFTER May 27, we are not required to send that information to you, but we must stop collection until we confirm that our information is correct. For ease, you may use the form below or you may write to us without the form. You may also include supporting documents.
- Call us to dispute. But if you do call, we are not required to send you information that shows you owe the debt. We must stop collection on any amount you dispute until we confirm that our information is correct.

If we do not hear from you, we will assume that our information is correct.

### What else can you do?

- Ask us to send you the name and address of the original creditor. Write by May 27, 2015 and we will stop collection until we send you that information. For ease, you may use the form below or you may write to us without the form.
- Learn more about your rights under federal law. For instance, did you know that you have the right to stop or limit how we contact you? For more information, see the enclosed *Summary of Rights* or go to the Consumer Financial Protection Bureau's website at [www.consumerfinance.gov](http://www.consumerfinance.gov).
- Contact us about your payment options.



Mail this form to:

North South Group  
P.O. Box 121212  
Pasadena, CA 91111-2222

Ms. Mary Smith  
2323 Park Street  
Apartment 342  
Las Vegas, NV 89109

### How do you want to respond to this notice?

Check all that apply:

- I want to dispute the debt because I think:
  - This is not my debt.
  - The amount is wrong.
  - I already paid this debt in full or I settled it.
  - You are not the right person to pay.
  - Other or more detail: \_\_\_\_\_
- I want you to send me the name and address of the original creditor.
- I enclosed this amount: \$ \_\_\_\_\_

Make your check payable to North South Group.  
Include the reference number 564-345.