

From: Jeff Joyce
Sent: Friday, August 3, 2018 9:18 AM
To: DFI MI DFI
Cc: Cory Magnuson
Subject: Student Loan Collections

To Whom It May Concern,

In accordance with WA SB 6029, we understand that there is a requirement to license student loan servicers. Our company, Capital Management Services, LP, is a licensed collection, licensed in your state under license number 602428469. The sole connection of our company to a Washington State consumer regarding a student loan is to collect the debt. The accounts that we are attempting to collector are all delinquent (meaning Charged-off) debts. Our company is not maintaining current accounts, nor are we accepting/processing payments on current accounts.

The opinion of the ACA, a collection industry trade group, is that the servicing license required under WA SB 6029 is not required for Collection Agencies. Our company shares that opinion, namely that the license is not required for our company. However, in an effort to maintain compliance with all applicable laws, we would appreciate an opinion from your office, indicating that our opinion is correct, and to ensure we operating compliantly in your state.

If you could send this directly to me I would greatly appreciate it.

Thank you,

Jeff Joyce

Vice President of Compliance & Licensing
Capital Management Services
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