

From: Kevin Coombs
Sent: Thursday, July 19, 2018 11:59 AM
To: Fazio, Lucinda (DFI) ; Phelps, Devon (DFI)
Subject: Interpretive Opinion

Lucinda/Devon:

Can you tell me if under the new Consumer Loan Act/Student Loan Servicer if a default collections group is considered a student loan servicer? I had this same question for other states and they do not consider them to be a student loan servicer, however I cannot determine it by reading the Washington definitions of Servicer.

I looked 31.04.015(32), (34), and (35) and 31.04.405(3) and (4).

Please advise.

Kevin Coombs