The CFPB reports that the majority of credit card issuers that responded to its survey outsource some collection activities to first-party collectors.269 These first-party collectors may engage in collection tasks like “mailing a reminder to the consumer to pay a bill or placing a phone call a few days into delinquency.”270

Accounts are typically outsourced “before 60 to 90 days of delinquency.”271 First-party collectors are typically required to use the credit card issuers case management system and dialer and to comply with any contact limit policies that the credit card issuer maintains for internal collections.272

Footnotes


270 Id. at 243.

271 Id. at 248.

272 Id. at 248–249.


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