Most large credit card issuers surveyed by the CFPB reported using first-party collectors to supplement in-house collection pre-charge-off.\textsuperscript{336}

First-party collectors used the credit card issuers’ case management system and call technology.\textsuperscript{337} Accounts were typically allocated randomly between credit card issuers’ in-house collectors and first-party collectors based on collector availability.\textsuperscript{338}

Footnotes

336 [336] Id. at 131, 136.

337 [337] Id.

338 [338] Id. at 136.


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