

December 30, 2015

Via Regular 1st Class Mail and Electronic Mail

Arne Duncan
Secretary of Education
400 Maryland Avenue, SW
Washington, DC 20202-3100
Attn: Office of Legislative and Congressional Affairs

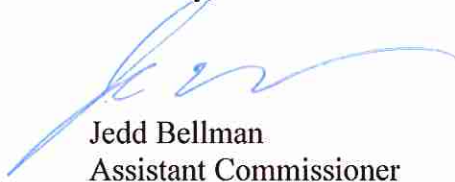
Re: Student Loan Servicers

Dear Secretary Duncan:

It has come to the attention of the Office of the Commissioner of Financial Regulation (“OCFR”) that third-party student loan servicers collecting on behalf of the U.S. Department of Education under its Direct Loan program may be subject to the Maryland Collection Agency Licensing Act (“MCALA”), Annotated Code of Maryland, Business Regulations Article (“BR”), Section 7-101 *et seq.* Under MCALA, a collection agency is defined, in relevant part, as an individual or business entity that engages “directly or indirectly” in the business of “collecting for, or soliciting from another, a consumer claim.”¹ All non-exempt businesses that act as collection agencies are subject to licensing and supervision by the State Collection Agency Licensing Board in OCFR (the “Board”).²

As a key government agency, any comments or thoughts as to whether business entities servicing governmental student loan debt need to be licensed under MCALA would be quite helpful to the Board and OCFR. Accordingly, I respectfully request a response to this letter by Friday, January 22, 2016. Please do not hesitate to contact me if you have further questions either by telephone at [REDACTED] or by email at [REDACTED]. Thank you for your consideration of this matter and I look forward to hearing back from you soon.

Sincerely,



Jedd Bellman
Assistant Commissioner

¹ BR § 7-101(c)(1)(i).

² See BR § 7-301 *et seq.*