

June 19, 2018

Acting Director Mick Mulvaney
Consumer Financial Protection Bureau
1700 G Street NW
Washington, DC 20552

Re: Agency/Docket Number: Docket No. CFPB-2018-0011 -- Request for Information Regarding the Bureau's Adopted Regulations and New Rulemaking Authorities – **New Authority to Write Debt Collection Rules**

Dear Acting Director Mulvaney:

The 46 undersigned consumer, community, civil rights and legal services groups submit these comments in response to the Consumer Financial Protection Bureau (“CFPB”)’s Request for Information (“RFI”) regarding its adopted regulations and new rulemaking authorities. In these comments, we focus on the CFPB’s new authority to write debt collection rules.

1. Summary

Abusive debt collection practices have been a problem for decades. Debt collection is consistently near the top--and usually at the top--of complaints at the Federal Trade Commission and now at the CFPB. Violations of the 1977 Fair Debt Collection Practices Act (“FDCPA”) remain routine. The advent of the debt buyer industry has exacerbated old problems and created new ones, as many consumers now face collection activities against the wrong person, for the wrong amount, by the wrong party, or for debt that is so old that records are lost or the consumer cannot be legally sued.

Congress gave the CFPB new authority to write regulations under the FDCPA. Any such rules must stay faithful to the statutory purposes, including: “to eliminate abusive debt collection practices” and “to insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged.”

As the CFPB undertakes a rulemaking concerning communications, it must focus on ending harassing communication, protecting consumer privacy, and increasing consumer control over collection communications. In particular, the CFPB should:

- Limit calls to one a week (with up to three attempted calls);
- Require collectors to obey the consumer’s oral request to stop calling;
- Ensure that newer communication technologies respect privacy, do not abuse or harass, and comply with the FDCPA;
- Prohibit the collection of time-barred debt or adopt very strict limits that prohibit suits on “revived” debt and limit communications to writings that include clear disclosures that the consumer cannot be sued.

Any new disclosures should build upon existing FDCPA disclosures and be tested for comprehension by the least sophisticated consumer.

The CFPB should reject calls from some in the collection industry for a “right to cure” violations of the FDCPA before consumers may exercise their rights under the statute. There is no right in the statute to have one free bite at violating the Act, there is no authority to add one, and to do so would encourage violations and harm both consumers and law-abiding collectors.

We provide more detail on these recommendations and several others below.

2. Background

More than 40 years after the enactment of the Fair Debt Collection Practices Act, consumers still experience a variety of abusive collection practices by debt collectors, including repeated or continuous collection calls; false or illegal threats; false representations about the alleged debt; efforts to collect debts with insufficient documentation; privacy violations concerning the alleged debt; and misleading collection practices related to time-barred debt.

The prevalence of abusive collection practices is reflected in the volume of consumer complaints. Debt collection is a leading source of consumer complaints to the Consumer Financial Protection Bureau (CFPB),¹ the Federal Trade Commission (“FTC”),² the Better Business Bureau,³ and others.⁴ In 2017, the most common category of debt collection complaints, cited by nearly two out of every five complaints, was “attempts to collect debt not owed.”⁵ In addition to receiving complaints from consumers, the CFPB has also surveyed consumers about their experiences with debt collection. The results of this survey indicated that respondents had experienced a variety of debt collection abuses, including 53% of respondents that were contacted about a debt in the year prior who “indicated that the debt was not theirs, was owed by a family member, or was for the wrong amount.”⁶

¹ Consumer Fin. Protection Bur., Annual Report 2018: Fair Debt Collection Practices Act (Mar. 2018), *available at* <http://files.consumerfinance.gov> (“In 2017, the Bureau handled approximately 84,500 debt collection complaints, making it one of the most prevalent topics of complaints about consumer financial products or services received by the Bureau.”).

² Fed. Trade Comm’n, Consumer Sentinel Network Data Book 2017 (608,535 complaints, or 22.74% of all complaints).

³ U.S. Better Bus. Bureau, 2016 Statistics Sorted by Complaints, *available at* www.bbb.org (in 2016 it received 16,817 complaints and more than three million inquiries about collection agencies). *See also* Emma Fletcher and Rubens Pessanha, BBB Institute for Marketplace Trust, 2016 BBB Scam Tracker Annual Risk Report: A New Paradigm for Understanding Scam Risk, *available at* www.bbb.org (the Better Business Scam Tracker received reports of a number of debt-related scams in 2016, including tax collection scams (7902), debt collection scams (2798), and credit repair/debt relief scams (487)).

⁴ CFA & NACPI, 2016 Consumer Complaint Survey Report (July 27, 2017), *available at* www.consumerfed.org (investigators who survey state and local consumer protection agencies to ask about their top complaints found that credit and debt complaints ranked fourth).

⁵ Consumer Fin. Protection Bur., Annual Report 2018: Fair Debt Collection Practices Act (Mar. 2018), *available at* <http://files.consumerfinance.gov>.

⁶ Consumer Fin. Protection Bur., Consumer Experiences with Debt Collection: Findings from the Bureau’s Survey of Consumer Views on Debt (Jan. 2017), *available at* https://files.consumerfinance.gov/f/documents/201701_Bureau_Debt-Collection-Survey-Report.pdf.

Debt collection is also an industry that touches the lives of millions of Americans every year. In 2016, 33% of Americans with a credit report had at least one debt in collection.⁷ In predominantly nonwhite zip codes, the share with debt in collection reached 45%.⁸ In 2017, the CFPB estimated that more than 70 million Americans were contacted about a debt in collection in the prior year.⁹

The CFPB has announced a rulemaking under the FDCPA and the current review of new rulemaking authorities provides an ideal opportunity for the CFPB to address the serious deficits in protections against abusive debt collection practices.

There is a long history of advocates bringing these issues to the attention of the CFPB, including responses¹⁰ to the ideas presented in the CFPB's Small Business Review Panel for Debt Collector and Debt Buyer Rulemaking Outline of Proposals under Consideration and Alternatives Considered ("SBREFA Outline") and other issues related to the debt collection rulemaking.¹¹ We will not attempt in these comments to address every issue.

These comments are intended to briefly highlight some critical opportunities to enhance consumer protection in the areas of communication practices and consumer disclosures, which the CFPB has identified as issues that may be addressed in a debt collection rulemaking.¹²

⁷ Urban Institute, Debt in America: An Interactive Map (Apr. 2018), *available at* <http://apps.urban.org/features/debt-interactive-map/>.

⁸ *Id.*

⁹ Consumer Fin. Protection Bur., Bureau Survey Finds Over One-In-Four Consumers Contacted By Debt Collectors Feel Threatened (Jan. 12, 2017), *available at* consumerfinance.gov/about-us/newsroom/Bureau-survey-finds-over-one-four-consumers-contacted-debt-collectors-feel-threatened/.

¹⁰ *See, e.g.*, Group Letter to Director Cordray (Mar. 17, 2017), *available at* nclc.org/images/pdf/debt_collection/sbrefa-fdcpa-lep-ltr-03172017.pdf (responding to SBREFA Outline); National Consumer Law Center, Comments to the Consumer Financial Protection Bureau on its Small Business Review Panel for Debt Collector and Debt Buyer Rulemaking Outline of Proposals under Consideration and Alternatives Considered (Feb. 28, 2017), *available at* nclc.org/images/pdf/debt_collection/debt-coll-sbrefa-cmnts-02282017.pdf; Melissa Stegman and Lisa Stifler, Center for Responsible Lending, Initial Analysis of Consumer Financial Protection Bureau's Proposed Outline to Address Debt Collection Abuses (Sept. 2016), *available at* responsiblelending.org/sites/default/files/nodes/files/research-publication/crl_debt_collection_cfpb_sep2016.pdf.

¹¹ *See, e.g.*, National Consumer Law Center, Debt Collection Rulemaking at the Bureau, *available at* nclc.org/issues/debt-collection-rulemaking-at-the-Bureau.html (collecting comments, press releases, letters, issue briefs, and white papers); Center for Responsible Lending, Comments to the Consumer Financial Protection Bureau on its Advance Notice of Proposed Rulemaking (Feb. 28, 2014), *available at* responsiblelending.org/sites/default/files/nodes/files/research-publication/CRL_Comments_to_ANPR_on_Debt_Collection_2-28-2014_Final.pdf.

¹² Debt Collection Rule (Spring 2018), *available at* reginfo.gov/public/do/eAgendaViewRule?pubId=201804&RIN=3170-AA41 ("The Bureau is preparing a proposed rule focused on FDCPA collectors that may address such issues as communication practices and consumer disclosures.").

3. Any Debt Collection Rules Must Be Guided by the Purposes of the FDCPA

Any debt collection rules developed by the CFPB should be guided by the purposes behind the FDCPA, including “eliminat[ing] abusive debt collection practices by debt collectors” and “insur[ing] that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged.”¹³ Congress also clearly identified “invasions of individual privacy” as a harm that the FDCPA was intended to address¹⁴ and, indeed, did address in numerous sections of the statute.¹⁵

Additionally, courts have consistently upheld a number of other important principles when interpreting the FDCPA, including: protection of the least sophisticated (or unsophisticated) consumer,¹⁶ the liberal interpretation of the FDCPA as a remedial statute,¹⁷ and strict liability of debt collectors who violate the statute.¹⁸ These principles should also guide the provisions of any debt collection rules.

It would be better to have no rule at all than to enact debt collection regulations that would negate these purposes.

4. Substantiation of Collection Information Is Critical to Protecting Consumers from Collection of Debt Not Owed

Debt collectors continue to cause consumers serious problems by attempting to collect from the wrong person, for the wrong amount, or by the wrong collector that are related to inadequate substantiation of collection information. As such, there is still a critical need for:

- Enhanced substantiation requirements;
- Improved collector responses to consumer disputes; and
- Prevention of lawsuits and default judgments based on faulty or inadequate documentation.

These ideas are discussed in detail in responses to the SBREFA Outline by consumer advocates.¹⁹

5. Any Rules about Collection Communications Need to Focus on 1) Ending Harassing Communication, 2) Protecting Consumer Privacy, and 3) Increasing Consumer Control over Collection Communications

¹³ 15 U.S.C. § 1692(e).

¹⁴ 15 U.S.C. § 1692(a).

¹⁵ See, e.g., 15 U.S.C. §§ 1692b, 1692c(b), 1692d(3), 1692d(4), 1692f(7), 1692f(8).

¹⁶ See National Consumer Law Center, Fair Debt Collection 3.2.1 (9th ed. 2018), updated at www.nclc.org/library.

¹⁷ *Id.* at 3.2.5.

¹⁸ *Id.* at 3.2.4.

¹⁹ *Supra*, n.10.

5.1. In General

In the CFPB's recent survey of consumer experiences with debt collection, 75% of consumers who requested that the creditor or debt collector stop contacting them reported that the contact did not stop.²⁰ This research shows a pervasive refusal to comply with this key consumer protection. The CFPB should enact regulations that enforce and strengthen collectors' legal obligations to comply with any cease communication requests,²¹ whether written or oral. Additional strategies for preventing harassment specific to the method of communication are discussed below.

Consumer privacy is a critical concern when discussing regulations related to debt collection communications. Privacy is relevant to particular methods of communication (discussed below) and in the CFPB's proposal to allow limited content messages in the CFPB's SBREFA Outline.

As discussed in the response to the SBREFA Outline,²² these limited content messages would violate 1692c(b) and consumer privacy. The CFPB should abandon this proposal.

The CFPB should increase consumer control over the debt collection process by clearly articulating the FDCPA requirement that communications cease when the consumer indicates that the communications are inconvenient.²³

If the consumer says that a particular method of communicating is inconvenient (i.e., when a consumer says stop calling, texting, emailing, etc.), the collector must stop contacting the consumer with that method of communication. But other types of communication may still be appropriate.

The CFPB should further clarify that collectors must comply with communication preferences whether expressed orally or in writing.²⁴ When a consumer is dealing with a harassing phone call, she should be able to say "stop calling" and have the collector stop all future calls.

Debt collection regulations can also promote consumers' ability to advocate for themselves by requiring all collectors with online payment portals to allow consumers to express communication and language preferences, submit disputes, and ask questions about the alleged debt online.

²⁰ Consumer Fin. Protection Bur., *Consumer Experiences with Debt Collection: Findings from the Bureau's Survey of Consumer Views on Debt 35* (Jan. 2017), *available at* s3.amazonaws.com/files.consumerfinance.gov/f/documents/201701_Bureau_Debt-Collection-Survey-Report.pdf.

²¹ 15 U.S.C. § 1692c(c).

²² National Consumer Law Center, *Comments to the Consumer Financial Protection Bureau on its Small Business Review Panel for Debt Collector and Debt Buyer Rulemaking Outline of Proposals under Consideration and Alternatives Considered* (Feb. 28, 2017), *available at* nclc.org/images/pdf/debt_collection/debt-coll-sbrefa-cmmnts-02282017.pdf

²³ 15 U.S.C. § 1692c(a)(1).

²⁴ *See, id.* (does not require consumer to provide information in writing).

Regardless of the communication method, the CFPB should clarify that FDCPA disclosure requirements²⁵ and privacy protections²⁶ always apply to all communications by debt collectors.

5.2. Phone Calls

Collectors should be prohibited from making more than three attempted phone calls per week per consumer, resulting in no more than one live conversation. Each time the collector causes the phone to ring counts as a phone call. This bright line should be used to establish violations of the FDCPA²⁷ absent explicit consumer consent to additional calls.

Collectors attempting to obtain location information from third parties²⁸ should be prohibited from attempting to contact third parties more than one time per week.

The CFPB should prohibit debt collectors from spoofing their numbers, and explicitly require the displayed number on the incoming call to be a toll free number that the consumer can use to return the collection call.

Collectors who know (or should know) that they are contacting someone at work should be required to ask if it is convenient for the consumer to talk at work. If the consumer says no, the collector should cease calling the consumer at work.

Collectors should be required to include opt-out mechanisms for all automated calls (e.g., “Press 1 to opt-out to prevent future calls at this number.”).

The CFPB should support enforcement of the Telephone Consumer Protection Act’s requirements for consent before debt collectors can make automated calls to cell phones.

5.3. Voicemails

As the law requires, collectors should be prohibited from leaving voicemail messages unless the voicemail is clearly set up to be heard only by the consumer or the consumer has specifically consented.

5.4. Email

The CFPB should study experiences with the opt-in email model in the New York debt collection regulations²⁹ to see if this is a viable model for the debt collection rulemaking.

²⁵ 15 U.S.C. §§ 1692d(6), 1692e(11).

²⁶ *See, e.g.*, 15 U.S.C. §§ 1692b, 1692c(b), 1692d(3), 1692d(4), 1692f(7), 1692f(8).

²⁷ 15 U.S.C. § 1692d(5).

²⁸ 15 U.S.C. § 1692c(b).

²⁹ 23 NYCRR § 1.6.

Due to the lack of privacy in most workplace email systems and absent explicit consumer consent to receive emails at work from the debt collector, regulations should prohibit collectors from emailing consumers at an email address that the collector knows (or should know) is a workplace email.

While no numerical cap on emails is needed, the CFPB should require all collectors who use email to include in every email a link to allow the consumer to opt out of any future emails. This could be done through a familiar “unsubscribe” feature.

Collectors must comply with the E-Sign Act if they want to send the validation notice³⁰ by email. The CFPB should clarify that E-Sign consent does not transfer from the prior creditors, debt collectors, or debt buyers. The CFPB should also refuse to exempt validation notices from the E-Sign consent requirement.

5.5. Text Messages

The CFPB should require all collectors who use text messages to include a statement saying “Text STOP to opt-out of future text messages” every time it texts a new phone number.

Because it may not be possible for the collector to provide all necessary disclosures in the first text message,³¹ the CFPB should prescribe a time frame during which these initial disclosures must be made in a series of text messages (e.g., sent within 60 seconds of initiating or responding to a text conversation).

As discussed above, the CFPB should prohibit spoofing the number of an incoming text message and ensure that the consumer can use the listed number to respond to the debt collector.

The CFPB should also clarify that the presumptive time for convenient text messages is between 8:00 am and 9:00 pm.

Due to the possibility of incurring charges for receiving text messages, collectors should be required to use free-to-end-user text messaging only.

5.6. Social Media

Regulations should prohibit collectors from sending communications about debts to consumers on social media platforms where the communication can be viewed by others (e.g. posting to a Facebook Timeline, tweeting at someone on Twitter, responding to a blog post, or posting in chat rooms that can be viewed by others).

The CFPB should also prohibit collectors from using deceptive methods to get consumers to connect with collectors on social media (e.g. using a false name or picture to get a consumer to “friend” the collector).

³⁰ 15 U.S.C. § 1692g(a).

³¹ See also 15 U.S.C. §§ 1692d(6), 1692e(11).

6. New Disclosures Should Build Upon Existing FDCPA Disclosures and Ensure Comprehension by the Least Sophisticated Consumer

The FDCPA currently provides for certain types of consumer disclosures.³² These disclosures represent the minimum requirements. CFPB regulations could build upon these requirements but not eliminate them.

Any disclosures considered by the CFPB should be consumer tested with a focus on ensuring comprehension by the least sophisticated consumer.³³ Testing should evaluate comprehension of the proposed disclosure as part of the document as a whole rather than in isolation.

6.1. Validation Notice³⁴

The CFPB should clarify that each collector must send a validation notice even if prior debt collectors also sent validation notices. Otherwise a creditor might effectively avoid the verification requirement by hiring a short-term debt collector who sends the validation notice and then hiring a second debt collector who claims that the validation notice requirements were satisfied by the first collector's notice.

As described in the SBREFA Outline, the CFPB should move forward with the creation of a model validation notice and statement of rights that would provide consumers with enhanced information about the debt and about their rights in debt collection.

The CFPB should improve language access for consumers with limited English proficiency by providing a translation in Spanish on the reverse of the model validation notice and statement of rights. Alternatively, where translations into other languages have been provided by the CFPB, a translation into one of these other languages should be substituted for Spanish when the debt collector knows (or should know) that this is the consumer's preferred language.

6.2. Disclosures Related to Credit Reporting

The CFPB should prohibit "parking" debts on a credit report by requiring the collector to communicate with the consumer about the alleged debt before reporting to a consumer reporting agency and to inform consumers that they intend to report it to a consumer reporting agency (CRA).

Collectors should be required to disclose that a debt is obsolete and cannot be reported to a CRA. As proposed in the SBREFA Outline, the CFPB should require collectors to obtain written acknowledgement from the consumer before accepting payment on a debt that is both time-barred and obsolete.

³² See 15 U.S.C. §§ 1692d(6), 1692e(11), 1692g(a).

³³ See, e.g., National Consumer Law Center, Fair Debt Collection ¶ 3.2.1 (9th ed. 2018), updated at www.nclc.org/library (discussing application of the least sophisticated or unsophisticated consumer standard to the FDCPA).

³⁴ 15 U.S.C. § 1692g(a).

6.3. Time-Barred Debt

Collecting time-barred debts causes substantial injury to consumers, particularly the least sophisticated consumers, who do not understand that the statute of limitations has run or that they have a legal defense. Such injury is not reasonably avoidable by consumers due to the complexity involved in understanding what a statute of limitations is, which limitations period applies to their debt, and when the relevant period has run. Moreover, attempts to collect time-barred debt mislead consumers who will reasonably believe that the collector has a legally-enforceable right to collect the amount sought. Efforts to collect time-barred debt can also be abusive because collectors may take advantage of the consumer's lack of understanding that a payment on a time-barred debt could be used to revive the debt and the ability to bring suit.

Disclosures about time-barred debts are not sufficient to protect the least sophisticated consumer from the range of abusive and deceptive practices that some collectors engage in when collecting time-barred debts. Instead, the CFPB should prohibit all efforts to collect on time-barred debt. The risks that any communications will be deceptive and will be misunderstood by the consumer and will result in injury are simply too great.

Alternatively, if the CFPB allows continued collection of time-barred debt it should enhance consumer protections by: prohibiting deceptive offers to “settle” a time-barred debt that imply that the collector still has the ability to file a lawsuit; forbidding suits on a “revived” debt; requiring repetition of a time-barred debt disclosure in each communication; limiting collection of time-barred debts to written communications that can be monitored and that included tested disclosures that enable consumers to understand the time-barred nature of their debt; prohibiting oral collection efforts, which will be inherently deceptive and abusive and cannot be easily reviewed or monitored; and prohibiting the sale or transfer of time-barred debts, as the buyers of such debts are more likely to lack accurate information on the debt and the consumer and to engage in deceptive abusive practices.

6.4. Litigation Disclosure

Lawsuits are a common method of debt collection. In one study, the CFPB found that 15 percent of consumers who had been contacted about a debt were sued in a collection lawsuit in the past year.³⁵ The CFPB has proposed requiring a litigation disclosure to provide additional information to consumers about debt collection in the hope that this will avoid some default judgments against consumers.³⁶

³⁵ Consumer Fin. Protection Bur., *Consumer Experiences with Debt Collection: Findings from the Bureau's Survey of Consumer Views on Debt* (Jan. 2017), *available at* https://files.consumerfinance.gov/f/documents/201701_Bureau_Debt-Collection-Survey-Report.pdf.

³⁶ Additional strategies for preventing default judgments are discussed at National Consumer Law Center, *Comments to the Consumer Financial Protection Bureau on its Small Business Review Panel for Debt Collector and Debt Buyer Rulemaking Outline of Proposals under Consideration and Alternatives Considered 57-59* (Feb. 28, 2017), *available at* nclc.org/images/pdf/debt_collection/debt-coll-sbrefa-cmmnts-02282017.pdf.

In order to maximize the effectiveness of a litigation disclosure requirement, the CFPB should develop a model litigation disclosure letter. The letter should provide information about how to: locate information about debt collection, find an attorney to defend the consumer in court (both legal services and private attorneys), and find information about representing oneself in court.

Collectors should be required to provide this letter to a consumer no more than 60 and no less than 15 days before litigation is initiated. In any conversations after the litigation disclosure has been sent, collectors should be required to inform the consumer of the date when the collector intends to file a lawsuit, to confirm receipt of letter, and to re-send it to proper address if not yet received.

7. The CFPB Should Reject Collection Industry Proposals that Would Harm Consumers

7.1. No Right to Cure

Some in the collection industry have asked the CFPB to create a right to “cure” FDCPA violations in the debt collection rulemaking. However, the FDCPA does not provide for a right to cure, the CFPB does not have the legal authority to create one, and no such proposal was included in the SBREFA Outline. Moreover, requiring a pre-suit notice would burden consumers’ ability to enforce their FDCPA rights. If a right to cure were implemented, collectors could simply wait until they were sued to stop violating the law and then claim that they had cured the violation.³⁷

7.2. Do Not Let “First-Party Collectors” Do an End Run Around the FDCPA

The CFPB should produce a report on first-party collections as it relates to medical debt collections, credit cards, and other areas. Using the findings from this report, the CFPB should draft regulations to: define when a debt is in default under 1692a(6)(F)(iii); clarify that there is no “de facto employee” exemption from the definition of debt collector under 1692a(6)(A); and define who is an “officer or employee of a creditor” under 1692a(6)(A).

* * *

We have listed our recommendations above without substantial elaboration in an effort to be brief. We encourage you to revisit our prior submissions on the debt collection rulemaking and to engage with consumers and consumer advocacy organization as you develop a debt collection rule.

Yours very truly,

Allied Progress
Americans for Financial Reform
Arizona Community Action Association
Arkansans Against Abusive Payday Lending
Arkansas Community Organizations

³⁷ See *Romero v. Dep't Stores Nat'l Bank*, 2018 WL 1079728 (9th Cir. Feb. 28, 2018) (rejecting debt collector’s argument that it cured violations of a California statute when it ceased calling consumer after it was sued).

Atlanta Legal Aid Society, Inc.
Brooklyn Coop Federal Credit Union
Center for Justice & Democracy
Center for NYC Neighborhoods
Center for Responsible Lending
Connecticut Veterans Legal Center
Consumer Action
Consumer Advocacy and Protection Society (CAPS)
Consumer Federation of America
Consumers Union
East Bay Community Law Center
Florida Alliance for Consumer Protection
Georgia Watch
Heartland Alliance for Human Needs & Human Rights
Interfaith Center on Corporate Responsibility
Jacksonville Area Legal Aid, Inc.
Kentucky Equal Justice Center
Legal Aid Foundation of Chicago
Maryland Consumer Rights Coalition
Mobilization for Justice
Mountain State Justice
NAACP
National Association of Consumer Advocates
National Association of Consumer Bankruptcy Attorneys (NACBA)
National Center for Law and Economic Justice
National Consumer Law Center (on behalf of its low-income clients)
National Fair Housing Alliance
North Carolina Justice Center
People's Action Institute
Public Good Law Center
Public Justice Center
Public Law Center
Tennessee Citizen Action
Texas Appleseed
The One Less Foundation
Tzedek DC
U.S. PIRG
Virginia Poverty Law Center
West Virginia Center on Budget and Policy
Woodstock Institute
World Privacy Forum