



March 10, 2009

John McNamara
LiveVox
450 Sansome St Ste 610
San Francisco, CA 94111-3350
Dear Mr. McNamara:

This is in response to the LiveVox request for an opinion regarding whether the use of technology allowing a debt collector to display a local area code on a consumer's caller identification device instead of the actual area code from which the call originates is in accordance with ACA International's Code of Ethics.

In order to determine whether the use of such technology would be in accordance with ACA's Code of Ethics, the Ethics Committee would need to consider a number of factors, including, but not limited to:

- The number displayed via caller ID;
- Other information displayed with the number, if any;
- Whether the consumer could call the number and reach the debt collector placing the call.

The Ethics Committee would need to examine the facts and circumstances of each case to determine whether the use of the above-described technology is in accordance with ACA International's Code of Ethics.

Sincerely,

A handwritten signature in black ink, appearing to read 'Valerie Hayes', is written over a light blue horizontal line.

Valerie Hayes
Corporate Counsel
ACA International