

**Statement before the
Middle Class Prosperity Project
“Tackling the Student Debt Crisis”**

April 2, 2015

Statement submitted by:

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Attorney

**National Consumer Law Center (NCLC) and
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Middle Class Prosperity Project

“Tackling the Student Debt Crisis”

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The National Consumer Law Center (NCLC) thanks Senator Warren and Representative Cummings for creating the Middle Class Prosperity Project and for inviting us to speak at this forum.

I submit this statement on behalf of the National Consumer Law Center’s low-income clients. The National Consumer Law Center (NCLC) is a nonprofit organization specializing in consumer issues on behalf of low-income people. We work with thousands of legal services, government and private attorneys, as well as community groups and organizations that represent low-income and older individuals on consumer issues. NCLC’s Student Loan Borrower Assistance Project provides information about student loan rights and responsibilities for borrowers and advocates. We also seek to increase public understanding of student lending issues and to identify policy solutions to promote access to education, lessen student debt burdens and make loan repayment more manageable.¹

In my work as the Director of NCLC’s Student Loan Borrower Assistance Project, I provide training and technical assistance to attorneys and advocates across the country representing low-income student loan borrowers. I have written numerous reports on student loan issues and am also the co-author of NCLC’s *Student Loan Law* practice treatise. I provide direct representation to low-income borrowers through Massachusetts-based legal services and work force development organizations. I also have daily contact with a wide range of borrowers through our student loan web site.

Education Drives Economic and Social Mobility

The federal student aid programs began during the 1960s as a way to improve access to education for lower-income individuals. In 1965, on signing the Higher Education Act, President Johnson said, “[The Higher Education Act] means that a high school senior anywhere in this great land of ours can apply to any college or any university in any of the 50 States and not be turned away because his family is poor.”² President Nixon echoed this message in 1970, stating that “No qualified student who wants to go to college should be barred by lack of money.”³

Measured by these goals, student aid policy has failed. College completion rates in the United States have been flat since the 1970s among all sectors of higher education. Lack of completion is a particular problem among lower-income individuals. The shocking reality is that

¹ See the Project’s web site at <http://www.studentloanborrowerassistance.org>.

² Quoted in Peter Sacks, *Tearing Down the Gates: Confronting the Class Divide in American Education* (2007).

³ *Id.*

despite all of the money spent on financial aid, the difference in college graduation rates between the top and bottom income groups has widened by nearly 50% over two decades.⁴ U.S. Education Secretary Duncan has admitted that college access disparities are “actually worsening.”⁵

College is a key ticket to social mobility in this country, but punching this ticket is rarely straightforward. The challenges are even greater given the changing demographics of college students today. **Most students do not follow a straight line from high school to a four year college to graduation.** Only 15% of undergraduate students live on campus. Three in 10 works full-time and one in four have their own children.⁶ Federal student aid policy must reflect and accommodate the reality that “non-traditional” students are now the majority of college students.

Finding Solutions to Help Students Manage Debt

There is no single solution to help more student borrowers manage debt. We need a multi-faceted approach, starting with school accountability. The best way to prevent financial distress and default is to help students succeed in college.

Other solutions include limiting borrowing by cutting college costs and increasing public subsidies for education, increasing grant aid, and targeting aid to the neediest students. It is also essential to simplify the student aid system. The current system has become so confusing that an entire industry of for-profit “debt relief” companies has sprung up to supposedly provide the services that borrowers should be able to access at no cost.⁷

My focus in this statement is on closing the access gap by improving the federal student loan system. Student debt burdens threaten to undermine the goals of federal student aid. It is not just the levels of debt that cause problems, but the levels of financial distress due to unmanageable student debt.

The stakes are high. Current federal aid practices and policies hammer students who do not succeed the first time around. The government can garnish a borrower’s wages without a judgment, seize his tax refund, even an earned income tax credit, seize portions of federal benefits such as Social Security, and deny him eligibility for new education grants or loans. Even in bankruptcy, most student loans must be paid. Unlike any other type of debt, there is no statute of limitations. Even those who can make some payments face serious damage to their credit reports or ability to get credit for critical purchases such as cars and homes. These policies prevent individuals from getting a fresh start and impede economic productivity by preventing many students from returning to school, succeeding, entering repayment on their loans, and entering the labor force.

⁴ Tami Luhby, “College Graduation Rates: Income Really Matters.” CNN Money (Nov. 28, 2011).

⁵ Quoted in Omari Scott Simmons, “Lost in Translation: The Implications of Social Capital for Higher Education Access” 87 Notre Dame Law Review 205 at 210 (Nov. 2011).

⁶ HCM Strategists, “The American Dream 2.0” (2013).

⁷ See National Consumer Law Center, “Searching for Relief: Desperate Borrowers and the Growing Student Loan ‘Debt Relief’ Industry” (June 2013).

Creating a System that Puts Borrower Needs First

As Senator Warren and five other United States senators emphasized in a February letter to Secretary of Education Duncan, the President's recent budget indicates that despite some declines in profits, the federal government is still expected to produce \$110 billion in profits from its student loans over the next decade. It does not have to be this way. We strongly agree with the Senators signing the recent letter that: "It is not the job of the Department of Education to maximize profits for the government at the cost of squeezing students who are struggling to get an education."⁸

Despite the human toll that we see every day with our clients, there is a common view that aggressive collection is necessary to shore up the student loan system. An attorney filing lawsuits on behalf of the government to collect student loans stated, "For every dollar collected from defaulted student loans, it's money that can be used again for student loans or taken off the deficit or used for other issues."⁹ One of the government's largest collectors, ECMC, justified aggressive collection practices by emphasizing that its efforts keep federal financial aid programs solvent.¹⁰

These statements emphasize keeping the loan programs alive, but at what cost? Under the current system, schools may be profiting as tuition continues to rise and private servicers and collectors may be profiting due to borrower misfortune, but we should not be growing our student loan system on the backs of defaulted borrowers or measuring success by private profit rather than student success. We do not believe that it works for borrowers or taxpayers to hound financially distressed borrowers until they die.

My statement highlights the following key recommendations to improve the student loan system and put borrower needs first:

- 1. Create a government agency that clearly puts students first**
- 2. Establish clear student loan borrower standards and protections**
- 3. Ensure that student loan borrowers have access to relief and an opportunity to enforce their rights**
- 4. Engage in rigorous public enforcement and oversight and hold the government and its contractors accountable**
- 5. Provide public information and study what works.**

Create a Government Agency that Clearly Puts Students First

The Obama Administration has taken numerous actions to expand relief for student loan borrowers and to prioritize the needs of borrowers. For example, President Obama said in June 2014 in speaking about student loan servicers, "We're going to make it clear that these

⁸ Letter to Secretary of Education Arne Duncan signed by Senators Warren, Baldwin, Blumenthal, Brown, Markey and Merkley (Feb. 25, 2015).

⁹ Ron French, "Michigan Goes Hard After Student Loan Defaulters" Bridge Magazine (May 15, 2012).

¹⁰ John Hechinger, "Taxpayers fund \$454,000 Pay For Collector Chasing Student Loans" Bloomberg (May 15, 2012).

companies are in the business of helping students, not just collecting payments, and they owe young people the consumer service, and support, and financial flexibility that they deserve.”¹¹ In his March Presidential Memorandum, the President said that “Now is the time for stronger protections for the more than 40 million Americans with student loan debt.”¹² We certainly agree, but we do not believe that these reforms are possible within the current student aid operational structure.

The very structure of the Department of Education’s Federal Student Aid (FSA) office creates barriers to reform. FSA is the operating arm of the Department of Education’s financial aid program. FSA is also the federal government’s first performance-based organization (PBO). The change to PBO status occurred in 1998. In large part, Congress selected FSA as the first performance-based organization because of problems with prior service and ballooning budgets.

Despite the good intentions of many individuals working in the Department, FSA is not specifically set up to put borrower needs first. Unlike the Consumer Financial Protection Bureau, FSA by its very nature has multiple constituencies, often with conflicting needs and goals. Students are only one of these groups and are often the least powerful.

There is considerable confusion about FSA’s goals and priorities, including a lack of consensus on how to measure servicer and collector performance. With respect to collection, for example we believe that the government should balance the need to collect student loans with the need to assist borrowers and ensure that their rights are respected. Yet the current system heavily favors high pressure collection and collector profits to the detriment of financially distressed borrowers seeking the help they so desperately need.

It is time to change the regulatory structure of federal student lending and end the PBO experiment. Student loan borrowers deserve and need an agency that is created to ensure that their rights are respected and that they receive the highest quality customer service.

Establish Clear Borrower Standards and Protections

In the critical area of servicing, there are some borrower protections in the contracts that the Department signs with student loan servicers. However, borrowers rarely know about those rights. Even borrowers who find out about their rights will have difficulty enforcing them. In general, the Department merely sets high-level goals in its contracts, such as requiring “best of business” practices or meeting “all statutory and regulatory requirements.” The Department then allows a significant level of variation within these high level goals.

The absence of clear borrower protections contrasts with other consumer credit areas such as credit cards and mortgages. In its October 2013 report, the CFPB pointed to protections in the Real Estate Settlement Procedures Act (RESPA) for mortgages and the CARD Act for

¹¹ Quoted in Shahien Nasiripour, “New Federal Data Show Student Loan Borrowers Suffering More than Previously Believed”, Huffington Post (March 27, 2015).

¹² Presidential Memorandum, Student Aid Bill of Rights (March 2015).

credit cards and the need to examine whether these types of reforms could apply to the student loan servicing market.¹³

Relying on a proprietary contract system hidden from the public and from borrowers is not appropriate in the federal student loan context. Federal student lending is not a typical marketplace. Federal student loans are government products *and* borrowers are *entitled* to various relief options by law. All borrowers should have the same access to these programs. It makes no sense that due to the vagaries of competition, only some borrowers have access to relief and comprehensive counseling.

Private contracts may be part of the solution, but only if combined with clear enforceable borrower rights and rigorous government oversight. NCLC's policy brief in the first attachment summarizes these complementary areas of reform in the context of servicing.

Once again, the stakes are high. Servicers are the borrower's primary point of contact. If the servicer is competent and efficient, many financially distressed borrowers will be able to avoid default. Quality servicing is also critical for current borrowers to ensure proper application of payments, and to provide accurate and timely information about accounts and other assistance.

The main problem with the current system is that federal student loan borrowers do not receive consistent quality service. Among other issues, we see servicers pushing borrowers into the quickest options, such as forbearance, rather than explaining and assisting borrowers to obtain more favorable long-term solutions, such as income-driven repayment.

The Department's requirements for student loan servicers also waste public funds. For example, when a borrower is incarcerated, the Department takes the position that servicers must conduct all required collection activities, including repeated efforts to contact incarcerated borrowers. This leads to absurd and inefficient results, with taxpayers footing the bill as servicers attempt to communicate with prisoners who cannot accept phone calls and/or attempt to place incarcerated borrowers with no access to income or bank accounts in income based repayment or unemployment deferments. The more efficient and sensible solution would be to at least place the accounts on hold during prison terms.

With respect to collection, private debt collectors are not adequately trained to understand and administer the complex borrower rights available under the Higher Education Act, and the government does not provide sufficient oversight of their activities. This is why we have called for the elimination of private student loan debt collectors and testing of alternative models, including in-house government collection.

The January 2017 collection letter in the second attachment from a Department of Education private collection agency contractor illustrates the range of problems with the current system. The letter states that the collector engaged in a review process of the borrower's account and then lists options that the borrower may be eligible for (presumably based on this review).

¹³ Consumer Financial Protection Bureau, "Annual Report of the CFPB Student Loan Ombudsman" (October 16, 2013).

In fact, the options presented appear to be haphazard at best, listing only four possibilities, two of which are available only if the borrower is incarcerated or deceased.

The first option in the letter on the surface may seem less troubling because loan rehabilitation is a good choice for many borrowers. Rehabilitation is one of the two main programs for borrowers to get out of default and back into current repayment status. The important point is not that rehabilitation is a bad option, but that it depends on individual circumstances. In this case, rehabilitation is listed first because of contractor, not necessarily borrower, priorities. Rehabilitation has traditionally been the favored option of the Department and therefore most heavily incentivized in the Department's commission payments structure.¹⁴

The fourth option, disability discharge, is a critically important program, but limited to borrowers who are totally and permanently disabled. The borrower who received this letter was not disabled, incarcerated or deceased. The supposed review that the collector conducted was not at all tailored to this individual's situation.

The Department has also failed to protect students from fraud. It has allowed for-profit schools to continue to receive federal student loan funds despite repeated signs of pervasive fraud. Then, having failed to prevent the harm, it has continued to demand that students repay these loans even after the fraud became public.

Congress created federal aid programs to help students and their families seeking to better their lives through education. Yet time and time again, the government has failed to fully implement the relief options enacted by Congress. As the senators recently summarized in their February letter, "Congress has also acted to grant more authority to the Department of Education to ensure that borrowers who need relief can, in appropriate circumstances, receive the assistance they need...Instead of implementing more policies designed to maximize federal profits on the backs of our kids, the Department should take further steps to implement the directives it has been given by Congress to ensure that our most vulnerable young people struggling with the burden of student loan debt have meaningful opportunity to build a strong future for themselves and their families."¹⁵

Ensure that Student Loan Borrowers have Access to Relief and an Opportunity to Enforce their Rights

Theoretically, government contractors could lose their contracts if they do not comply with the law. As discussed below, this rarely occurs due to lax government oversight. However, even if the government does act, as recently occurred with collection agency contract cancellations, there are no provisions requiring relief for borrowers.

¹⁴ See generally National Consumer Law Center, "Pounding Student Loan Borrowers: The Heavy Costs of the Government's Partnership with Debt Collection Agencies" (Sept. 2014).

¹⁵ Letter to Secretary of Education Arne Duncan signed by Senators Warren, Baldwin, Blumenthal, Brown, Markey and Merkley (Feb. 25, 2015).

Currently borrowers can complain to the Department of Education if they can figure out how to file complaints. Given documented problems with the Department's oversight, this is less than a complete solution even for those borrowers who persist and manage to speak to someone or file a complaint. But beyond complaining, it is virtually impossible for a borrower to enforce her rights. Even in the case of the now well documented breakdown in the Department's rehabilitation system, a 2014 GAO report shows in detail how most borrowers were left in the cold. According to GAO testimony, less than 10% of the estimated 80,000 borrowers affected by the delays in loan rehabilitation received assistance to make them whole.¹⁶

A robust complaint system is essential to allow borrowers the opportunity to get relief, but this is not enough to ensure that borrowers have access to their rights. There should also be an escalation system so that the borrower can seek review if she disagrees with the proposed resolution. There should also be a more formal appeals process for borrowers who apply for particular programs and believe they are wrongly denied.¹⁷

Borrowers who cannot find solutions through these informal processes should have the opportunity to appeal and if necessary seek private enforcement. The current lack of private enforcement shuts the door on borrowers seeking to access programs that they are entitled to under the Higher Education Act. This glaring problem also undermines the effectiveness of new borrower-friendly programs because loan holders and servicers are not held accountable when they fail to comply with the law.

In general, there has been a shocking lack of accountability as the Department of Education continues to hire the same old players in the student loan industry despite repeated examples of legal violations, misrepresentations, and other problems.

For example, one of the main government student loan servicers, the Pennsylvania Higher Education Assistance Agency (PHEAA), repeatedly argues in court that it is immune from suit for violating federal laws. In a recent case, a 28 year old student loan borrower sued PHEAA under the federal Fair Credit Reporting Act, alleging that PHEAA had failed to correct inaccurate reports stating that the borrower had defaulted on tens of thousands of dollars in student loans. The complaint shows that these loans that were not, in fact, his.¹⁸

The plaintiff borrower summarized his plight: "For my generation, student loans are such a big part of our lives, so it's unfathomable that this huge loan agency wouldn't be responsible when they make mistakes that affect borrowers' lives so significantly.... I never want anyone else to experience what I did – having my credit history marred by debts that aren't mine and to have to put my life on hold."¹⁹

¹⁶ Statement of Melissa Emrey-Arras, U.S. Government Accountability Office, Testimony before the Subcommittee on Higher Education and Workforce Training, Committee on Education and the Workforce, House of Representatives (March 12, 2014).

¹⁷ See generally NCLC's Response to the FSA's Request for Information about Title IV Servicing (January 30, 2015), available at: <http://www.studentloanborrowerassistance.org/wp-content/uploads/2013/05/response-rfi-servicing-jan2015.pdf>.

¹⁸ Public Citizen, Press Release, "Pennsylvania Higher Education Assistance Agency-One of Nation's Largest Student Loan Servicers-Should Not be Immune from Consumer's Lawsuit" (Dec. 22, 2014).

¹⁹ Id.

In another example, the government has continued to hire companies like Sallie Mae with histories of problems.²⁰ Nearly a year ago, the Department promised to investigate Sallie Mae when presented with evidence of violations, including against service members. As far as we know, the Department has yet to announce the results of this investigation.

In March 2014, James Runcie, Chief Operating Officer of FSA told the U.S. Senate that the department feared the potential “dislocation” borrowers would face if Sallie Mae’s loans were shifted to new companies. Senator Harkin responded: “It sounds like your answer, Mr. Runcie, was that they’re too big to fail.”²¹ “Too big to fail” is not good news for borrowers, taxpayers, or anyone who remembers the all too recent credit crash and believes we must learn from past mistakes.

Engage in Rigorous Public Enforcement and Oversight and Hold the Government and its Contractors Accountable

The Department has authority to terminate contracts or otherwise penalize contractors that violate program requirements. The Department has been lax in using these tools. Other agencies such as the CFPB and many state Attorney General offices have stepped up. For example, the CFPB recently highlighted collector misrepresentations and other problems in examination of federal student loan debt collectors.²² Still more needs to be done.

In addition to oversight and enforcement, the Department should collect and make public information about contractor performance and any corrective actions. A July 2014 letter to the Department from U.S. Senators McCaskill and Warren lists key categories of information that the Department should provide on a regular basis, including audits, cost estimates and performance reports.²³ This is critical not only so that borrowers know their rights, but also so that the government acts efficiently by tracking patterns and analyzing data.

The government should also release public information about actions that the government takes to rein in contractors. For example, we applauded when the Department recently announced that it had cancelled five private debt collection agency contracts, but we are waiting for clarification about whether these were cancellations of existing contracts that were set to expire or cancellations of renewed contracts. Further, the Department has not announced any restitution for borrowers harmed by collection agency practices or plans for transition to other agencies.

²⁰ See generally National Consumer Law Center, “The Sallie Mae Saga: A Government-Created, Student Debt Fueled Profit Machine” (Jan. 2014).

²¹ Quoted in Shahien Nasiripour, “How Arne Duncan is Undercutting Senate Democrats on Student Loan Reforms”, Huffington Post (May 7, 2014).

²² Consumer Financial Protection Bureau, Supervisory Highlights (Winter 2015).

²³ A copy of the July letter from Senators McCaskill and Warren is available at: <http://www.mccaskill.senate.gov/media-center/news-releases/mccaskill-warren-join-colleagues-to-question-department-of-education-on-oversight-and-renegotiation-of-student-loan-contracts->.

Provide Public Information and Study What Works

The government should study contractor performance and outcomes as a prerequisite to creating new systems. We also need information about how the government measures collection agency performance. We have attempted for some time to obtain more information through FOIA requests, but have been stonewalled for the most part. We are very concerned about the trend away from providing the public and legislators with the information needed to ensure that borrowers and taxpayers are protected.

We urge the Department of Education to make long-term data available to researchers AND to conduct internal studies using this data. Requiring private lenders to report data on private student loans, potentially through the NSLDS system, would open up another set of data to study borrower outcomes over time.

Unfortunately, the Department of Education has not demonstrated that it can competently analyze loan performance and other data. Yet it has generally been unwilling to reach out to other agencies with greater expertise.

Professor Susan Dynarski noted in a recent article that in the mortgage area, government and private analysts study publicly released information to gauge, in real time, the mortgage market's health.²⁴ She calls this a "terrific model" for what should be done with student loans. Instead, she argues that "the federal student loan data remains locked within the walls of the Education Department, with limited metrics trickling out." Professor Dynarski suggests that a longer term solution could be to move the loan program out of the Education Department entirely. Again, the goal is to create a new structure for federal aid that not only puts borrower's needs first, but also opens up the student loan industry to the light of day.

It is also time to create pilot programs and study what works. For example, the recent Presidential memorandum requires the Secretary of Treasury in consultation with the Secretary of Education to report on the initial findings of an ongoing pilot program to test ways to improve the debt collection process. This is a great opportunity to test different models with the goal of understanding how to collect money when appropriate AND inform and counsel borrowers about the full range of available options.

Conclusion

The student loan programs work well for many students who are able to complete their educations and earn sufficient income after graduation to repay their debts within a reasonable period of time. Unfortunately, this scenario is becoming less common as borrowers get deeper into debt earlier in the process and do not know about available, if limited, options that could help them avoid problems down the road. Once these problems begin, collection costs and fees accrue so rapidly and aggressive collection efforts hit so hard that many borrowers never recover.

²⁴ Susan Dynarski, "So Much Student Debt, So Little Information", *New York Times* (March 22, 2015).

While the student loan programs are here to stay, there are ways to alleviate the burden for the most vulnerable and lower income borrowers. Our higher education system and economic productivity depend on how we resolve these issues. Access to higher education is key to help struggling families remain in the middle class and help those lower on the economic ladder to get ahead.

Thank you for your consideration of these comments and for inviting me to speak at this important forum. Please contact Deanne Loonin (dloonin@nclc.org; 617-542-8010) with questions or comments.

ATTACHMENT

Making Federal Student Loan Servicing Work for Borrowers

Incentivize High Quality Servicing and Create Real Competition

Incentives matter, but are not enough to protect consumers

Priorities:

- Incentivize default prevention and high quality servicing
- Use performance measures tied to actual performance (the current system is too focused on satisfaction surveys)
- Open up competition beyond the same old players
- Allow borrowers to switch servicers
- Set up pilot projects to test different models

Provide Real Relief for Borrowers and Information about Relief Options

Borrowers are too often stuck in a never ending nightmare where they are continually sent back to complain to the same people that started the whole problem

Priorities:

- Require effective complaint resolution processes and make sure borrowers know how to use them
- Ensure that borrowers have private enforcement rights
- Develop clear and enforceable borrower servicing rights (the system must work for borrowers, not just for private profit)
- Provide easily accessible information for borrowers

Punish Bad Actors

Senator Elizabeth Warren questioning Federal Student Aid CBO William Leith in September 2014 said: "Let me get this straight: You break the law. You don't follow the rules. You treat the borrowers badly...and you all just renegotiated the contracts to make sure that across the portfolio [loan servicers] are going to make a little more money if nothing changes?"

Priorities:

- Engage in rigorous public enforcement, including sanctions, contract terminations and other penalties when servicers fail to comply with the law
- Avoid conflicts of interest by creating a single point of entry to the servicing system
- Provide public information about the results of audits, investigations and enforcement actions

ATTACHMENT

Performant 
Recovery INC

Formerly known as Diversified Collection Services, Inc. (DCS, Inc.)
P.O. Box 9054, Pleasanton, CA, 94566-9054

Collector Name: Ted [REDACTED]
Collector Phone: [REDACTED]-224-6541
Main Line: 209-858-0600

January 7, 2015



[REDACTED]
[REDACTED]
[REDACTED]
ROSLINDALE MA [REDACTED]

Re: Performant Recovery, Inc.
Claim of: U.S. DEPARTMENT OF EDUCATION
Account No: 1016 [REDACTED]
Performant Acct #: [REDACTED]
Balance: \$7433.11

Dear [REDACTED]

As you know, Performant Recovery, Inc. is handling your defaulted student loan for the U.S. Department of Education. Recently, your account went through a review process and it appears you may be eligible to resolve your obligation through one of the options listed below:

- o Loan Rehabilitation
 - o Reasonable and affordable repayment based on your ability to pay.
- o Disability Discharge
 - o You may be eligible for a loan discharge if you are totally and permanently disabled.
- o Incarcerated
 - o You may be eligible for postponement of collection efforts.
- o Deceased Borrower
 - o If borrower is deceased loan will be discharged.
 - o Parent Loan for Undergraduate Student (PLUS)- If student is deceased, the PLUS loan will be discharged.

**

To find out if you are eligible for one of these programs or to receive more details please contact, our office at (888) 335-6267 ext. 2560. This is an attempt to collect a debt by a debt collector, and any information obtained will be used for that purpose.

Sincerely,

Performant Recovery, Inc.
Beth Roberts
888-335-6267 ext. 2560

SEE THE REVERSE SIDE FOR IMPORTANT INFORMATION.