

August 19, 1998

Re: Centralized Collections Center

Dear Ms. Picker:

I write to acknowledge receipt of your letter of April 6, 1998 regarding the transfer of collection activities from _____ West Virginia, Inc. to _____ Bank, a national bank chartered in _____.

You are correct in your assertion that _____, as a bank, is not a "collection agency" regulated by the Collection Agency Act of 1973. See WV Code 47-16-2(b). However, you should advise _____ that it is a "debt collector" as that term is defined in the West Virginia Consumer Credit and Protection Act. See WV Code 46A-2-122(d). As a debt collector, _____ will be subject to the provisions contained in WV Code 46A-2-123 through -2-129a.

I hope this letter is helpful. If you need further information, please feel free to contact me.

Sincerely,

Robert J. Lamont
General Counsel