



IN RE FIRSTSOURCE ADVANTAGE, LLC

2017-MISC-Firstsource Advantage, LLC-0001

DECISION AND ORDER ON PETITION BY FIRSTSOURCE ADVANTAGE, LLC TO MODIFY OR SET ASIDE THE BUREAU'S SECOND CIVIL INVESTIGATIVE DEMAND

Firstsource Advantage, LLC (“Firstsource”) has petitioned the Bureau of Consumer Financial Protection (“Bureau”) for an order to set aside or modify a civil investigative demand (“CID”) issued to Firstsource. For the reasons set forth below, the petition is denied. Firstsource also requests confidential treatment of materials submitted. That request is granted in part and denied in part.

FACTUAL BACKGROUND

On September 28, 2017, the Bureau issued a CID to Firstsource seeking information about its debt collection practices. The CID included a Notification of Purpose which stated that the CID had been issued:

to determine whether debt collectors, depository institutions, or other persons have engaged or are engaging in unlawful acts and practices in connection with the collection of debt in violation of §§ 1031 and 1036 of the Consumer Financial Protection Act of 2010 [(“CFPA”)], 12 U.S.C. §§ 5531, 5536; the Fair Debt Collection Practices Act [(“FDCPA”)], 15 U.S.C. § 1692 et seq.; or any other Federal consumer financial law.

The Notification of Purpose further advised that a purpose of the investigation was “also to determine whether Bureau action to obtain legal or equitable relief would be in the public interest.” The CID required that, by October 31, 2017, Firstsource provide answers to interrogatories and produce documents, written reports, and other tangible things.

Pursuant to the Bureau’s rules, Firstsource was required to meet and confer with a Bureau investigator within 10 days of its receipt of the CID. *See* 12 C.F.R. § 1080.6(c). Firstsource conferred with members of the Bureau’s Office of Enforcement on October 10, 2017. Firstsource and the Bureau exchanged correspondence following this meeting, and, on October 18, 2017, Firstsource filed its Petition to Set Aside or Modify the Bureau’s Second Civil Investigative Demand (the “Petition”).

LEGAL DETERMINATION

Firstsource argues that the CID should be set aside for various reasons and that, in the alternative, the CID should be modified to reduce Firstsource’s burden of responding. The arguments presented by Firstsource, however, do not warrant setting aside or modifying the CID. Firstsource also requests confidential treatment of materials related to the Petition. Though Firstsource fails to demonstrate good cause for omitting these materials from the public

record in their entirety, there is good cause to justify redacting certain confidential information. The request for confidential treatment is thus granted in part and denied in part.

I. FIRSTSOURCE’S PETITION TO SET ASIDE OR MODIFY THE CID

A. Request to Set Aside the CID

Firstsource first argues that the CID is not proper because it is “rooted in erroneous factual and legal understandings as they pertain to Firstsource, the Dodd-Frank Act, and the FDCPA.” Pet. at 19. Firstsource also argues that “it is clear that the purported FDCPA violations asserted by the Bureau . . . are not actionable under the bona fide error rule” and that, as a result, the Bureau has “no reasonable basis to believe there exists a violation of the FDCPA, or that the contents of the [CID] could lead to information ‘relevant to a violation.’” *Id.* at 24. Firstsource’s arguments here are misplaced, as they do not relate to the scope of the Bureau’s authority to issue CIDs. Instead, these arguments prematurely assert substantive defenses to claims the Bureau has not yet asserted and may choose not to assert.

An entity’s fact-based arguments about whether it has complied with substantive provisions of the CFPA or any other enumerated consumer law, such as the FDCPA, are not valid defenses to the enforcement of a CID. *See In re Source for Public Data, LP*, 2017-MISC-The Source Public Data, L.P.-0001 (Feb. 14, 2017), at 2.¹ Under the CFPA, the Bureau’s investigative authority to issue CIDs extends to “any person” who may have any information “relevant to a violation” of federal consumer financial law, including the FDCPA. 12 U.S.C. §§ 5562(c)(1); 5481(12)(H), (14). The Supreme Court has “consistently reaffirmed” the principle that “courts should not refuse to enforce an administrative subpoena when confronted by a fact-based claim regarding coverage or compliance with the law.” *EEOC v. Karuk Tribe Hous. Auth.*, 260 F.3d 1071, 1076 (9th Cir. 2001) (citing, *inter alia*, *United States v. Morton Salt Co.*, 338 U.S. 632, 652–53 (1950)). Courts routinely permit agencies to investigate without first proving that the agency would ultimately have authority to bring an enforcement proceeding. *See FTC v. Ken Roberts Co.*, 276 F.3d 583, 586 (D.C. Cir. 2001) (“[C]ourts of appeals have consistently deferred to agency determinations of their own investigative authority, and have generally refused to entertain challenges to agency authority in proceedings to enforce compulsory process.”) Indeed, the responses to a CID may be highly relevant to determining the merits of the agency’s potential claims and the party’s defenses. And, as the D.C. Circuit has noted, “[i]f parties under investigation could contest substantive issues in an [administrative subpoena] enforcement proceeding, when the agency lacks the information to establish its case, administrative investigations would be foreclosed or at least substantially delayed.” *FTC v. Texaco, Inc.*, 555 F.2d 862, 879 (D.C. Cir. 1977) (en banc).

Next, Firstsource argues that the issuance of the CID “is not within the Bureau’s authority under the Dodd-Frank Act” because “the Bureau has not identified (and cannot identify) any legally cognizable reason to believe that Firstsource violated the FDCPA.” Pet. at 25. Even if Firstsource’s assertion were true, this is not the applicable standard. The CFPA, 12 U.S.C. § 5562(c)(2), simply requires a CID to “state the nature of the conduct constituting the alleged violation which is under investigation and the provision of law applicable to such

¹ https://www.consumerfinance.gov/documents/2782/201703_cfpb_Decision-and-Order-on-Petition-by-The_Source-for-Public-Data-LP.pdf.

violation.”² This standard does not require a detailed narrative or, as Firstsource demands, a “meaningful dialogue . . . about the purpose of the investigation.” Pet. at 27.

The CID that the Bureau issued to Firstsource meets the CFPA’s notice-of-purpose requirement, despite Firstsource’s assertion that the CID’s Notification of Purpose “is written in a vague and formulaic fashion.” Pet at 25. Firstsource points to various cases in support of its argument, including *In re Sealed Case (Administrative Subpoena)*, 42 F.3d 1412 (D.C. Cir. 1994). Firstsource’s reliance on these cases is misplaced, however, as the nature of the defects courts identified in other CIDs is not present here. Courts regularly enforce CIDs with statements of purpose that have comparable breadth and specificity to the one in the CID issued to Firstsource. See, e.g., *FTC v. O’Connell Assocs., Inc.*, 828 F. Supp. 165, 170–71 (E.D.N.Y. 1993) (approving CID with similar statement of purpose); *Hyster Co. v. United States*, 338 F.2d 183, 184–86 (9th Cir. 1964) (approving CID with similar statement of purpose); *Gold Bond Stamp Co. v. United States*, 325 F.2d 1018, 1018 (8th Cir. 1964) (approving CID with similar statement of purpose). Unlike in those CIDs, the asserted investigatory purpose at issue in *In re Sealed Case*, for example, was far broader than the asserted purpose here, referring to “other wrongdoing, as yet unknown,” which is an unlimited area rather than a realm defined by statute. 42 F.3d at 1418. And even in that case, though disapproving of this undefined language, the court enforced the subpoena to the extent that it sought information relevant to permissible purposes that the subpoena also listed. *Id.* at 1414. The other cases relied upon by Firstsource, *Civil Aeronautics Board v. United Airlines, Inc.* and *Sunshine Gas Co. v. United States Department of Energy*, are likewise inapplicable for this reason. See 542 F.2d 394, 402 (7th Cir. 1976); 524 F. Supp. 834, 838–41 (N.D. Tex. 1981).

Firstsource’s argument based on *CFPB v. Accrediting Council for Independent Colleges and Schools* (“ACICS”), 854 F.3d 683 (D.C. Cir. 2017), is likewise misplaced. The CID to Firstsource differs substantially from the CID at issue in *ACICS*, which was issued to an organization engaged in the accreditation of for-profit colleges. *Id.* at 685. Although the Bureau acknowledged it had no interest in educational accreditation as such, the Bureau argued that it had an interest in investigating the link between the accreditation process and the lending practices of colleges accredited through that process. *Id.* at 691. The court found that the CID was defective, not because the link between accreditation and these lending practices was beyond the scope of the Bureau’s investigative authority, but because that link “[did] not appear on the face of the Notification of Purpose.” *Id.*

In contrast to the CID in *ACICS*, the Notification of Purpose in the CID issued to Firstsource identifies conduct at issue that falls squarely within the Bureau’s authority under the CFPA (*i.e.*, “the collection of debt”) and makes clear that this is the conduct being investigated. See 12 U.S.C. § 5481(15)(A)(x). Firstsource not only has shown that it adequately understands the activity under investigation but also has provided substantive legal defenses to potential violations of law it believes the Bureau to be investigating. In sum, the fact that “a notification of purpose [uses] broad terms to articulate an investigation’s purpose,” as is the case here, does not constitute a defect in the CID. See *ACICS*, 854 F.3d at 690. Despite its generality, the Bureau’s Notification of Purpose has provided Firstsource “with sufficient notice as to the nature of the conduct and the alleged violation under investigation” and provides an ample basis to

² Firstsource also argues that, under 12 U.S.C. §5562(c)(1), the Bureau must have a “ ‘reason to believe’ that a federal consumer protection law was violated” in order to issue a CID. Again, Firstsource misconstrues the standard required by the CFPA. Section 5562(c)(1) gives the Bureau authority to issue a CID “[w]henver the Bureau has reason to believe that any person may be in possession, custody, or control of any documentary material or tangible things, or may have any information, relevant to a violation.”

determine that, under *Morton Salt*, “the inquiry is within the authority of the agency and [] the information sought is reasonably relevant.” *Id.* at 690, 691.

Finally, Firstsource makes a general claim throughout the Petition that it has already produced data and documents to the Bureau and, therefore, should not be asked to produce more. *See, e.g.*, Pet. at 1–2, 10, 12. Firstsource has previously produced information to the Bureau, but the Petition offers no legally cognizable argument as to why this should preclude enforcement of the CID and, indeed, has not demonstrated that any of the information requested in this CID is duplicative of information that the Bureau already possesses. Firstsource therefore has not shown that the CID is unreasonably duplicative or unduly burdensome on this ground. *See, e.g., Fresenius Med. Care v. United States*, 526 F.3d 372, 376–77 (8th Cir. 2008) (rejecting argument that administrative “subpoenas are unreasonable because they request documents given the government in previous investigations” where recipient “fail[ed] to identify the documents already in the government’s possession.”). Firstsource also seems to suggest that, because the information now requested does not seem “traceable” to information produced in response to the First CID and because the Bureau *could* have previously requested this information in the First CID and in other contexts, this CID is improper. *See* Pet. at 13. This argument is unavailing and, again, seems to misconstrue the requirements for issuing a CID. As noted above, the Bureau properly issued this CID pursuant to its investigative authority under 12 U.S.C. § 5562(c)(1) and consistent with the requirements of § 5562(c)(2). Firstsource identifies no authority that precludes a law enforcement agency from making follow-up requests for information; to the contrary, as also noted above, the CID here meets the applicable standard established by the Supreme Court in *Morton Salt*, and adequately informs Firstsource of the purpose of the CID and investigation. *See Morton Salt*, 338 U.S. at 369 (“Even if one were to regard the request for information in this case as caused by nothing more than official curiosity, nevertheless law-enforcing agencies have a legitimate right to satisfy themselves that corporate behavior is consistent with the law and the public interest . . . [I]t is sufficient if the inquiry is within the authority of the agency, the demand is not too indefinite and the information sought is reasonably relevant.”).

For the foregoing reasons, Firstsource’s request that the CID be set aside is denied.

B. Requested Modifications

Firstsource requests that, “in the alternative to setting aside the [CID] in its entirety[,] the Bureau state its rationale for the investigation, including a response to the issues raised regarding the lack of basis to believe violations occurred.” Pet. at 28. Firstsource reasons that only thereafter can Firstsource and the Bureau discuss production of materials responsive to the CID. *Id.* at 28–29. Firstsource thus requests a modification to the *process* for responding to a CID— not a modification to the CID itself. Firstsource identifies no basis in the Bureau’s regulations for such a request; in any event, as discussed above, the Notification of Purpose in the CID provides Firstsource with sufficient notice under applicable law. The CID identifies potential violations of specific statutory provisions regarding conduct associated with the collection of debt.

Firstsource also argues that the CID should be modified because it seeks nonexistent information which Firstsource is not required to create under the Federal Rules of Civil Procedure. Pet. at 29. This claim appears to be based on an incorrect understanding of Requests for Tangible Things 1 and 2. Specifically, Firstsource contends that these items request “a list of calls,” which Firstsource “does not have, and does not have the ability to create.” Pet. at 30. However, Requests for Tangible Things 1 and 2 very clearly request “recordings of calls,”

which Firstsource admits to having in its possession in the Petition. Since the text of the CID is clear that it seeks the recordings, and not lists, there is no basis to modify the CID on this ground.

Additionally, Firstsource requests that the CID be modified to include definitions for the terms “settlement options” and “credit bureau disclosure,” used in Requests for Tangible Things 1 and 2, respectively. *See, e.g.*, Pet. at 31 and 40. However, the Bureau has already provided Firstsource with its understanding of how Firstsource used those terms. Specifically, the Bureau provided Firstsource with Bates numbers of documents previously submitted by Firstsource that illustrate circumstances in which Firstsource appeared to be discussing settlement options and credit bureau disclosures. When Firstsource requested clarification, Bureau staff promptly provided additional context, including numerous additional references to Firstsource’s own documents. Given the specificity of the Bureau’s clarifications to date, it is not necessary to modify the CID to include definitions of these terms.

Firstsource also contends that the CID should be modified to delete Requests for Tangible Things 1, 2, and 3 because they are “disproportionate.” Pet. at 35. Firstsource offers three arguments in support of this contention, all of which are unavailing on the current record.

First, Firstsource primarily relies on its argument that complying with these requests would impose an undue burden because the requests require “a manual review of hundreds of thousands of audio files.” Pet. at 31. This statement, on its own, is not an adequate showing of undue burden. At least one circuit court of appeals has held that, in the administrative subpoena context, “[w]hat is unduly burdensome depends on the particular facts of each case and no hard and fast rule can be applied to resolve the question.” *EEOC v. United Air Lines, Inc.*, 287 F.3d 643, 653 (7th Cir. 2002) (citing *F.T.C. v. Shaffner*, 626 F.2d 32 (7th Cir.1980)). Firstsource has not met this standard. Firstsource’s only specific contention with respect to the purported burden of the production is the assertion that the request for recordings would require manual review of audio files. But, “[c]onclusory allegations of burdensomeness are insufficient.” *Id.*; *see also In re Rent-A-Center*, 2017-MISC-RENT-A-CENTER-001 (Oct. 12, 2017),³ at 6 (quoting *In re UniRush, LLC*, 2015-MISC-UniRush-0001 (Dec. 2, 2015),⁴ at 3).

Second, Firstsource argues that the CID is disproportionate because it is “unlikely to serve an investigatory purpose.” Pet. at 35. This contention is based on the argument that the Bureau’s investigation is improper because Firstsource believes it has not violated the law. As explained above, this argument is unavailing, and as such, it does not warrant ordering any modification to the CID.

Third, Firstsource argues that the CID is disproportionate because “imposing this burden on Firstsource is unnecessary.” Pet. at 36. This argument is premised on the notion that the Bureau *could* have requested a sampling approach, rather than demanding “[a]ll recordings.” CID at 1. Firstsource proposed no such modification during the meet-and-confer process. Only now, through its Petition, has Firstsource suggested “designing a statistically sound sampling approach.” Pet. at 37. This proposal is not timely under the applicable rules. *See* 12 C.F.R. § 1080.6(c)(3) (“The Bureau . . . will consider only issues raised during the meet and confer process”). But, even if it were, Firstsource has failed to provide any background

³ https://www.consumerfinance.gov/documents/5730/cfbp_petition-to-modify_rent-a-center-inc_decision-and-order.pdf.

⁴ http://files.consumerfinance.gov/f/201512_cfbp_decision-on-petition-by-unirush-llc-to-modify-or-set-aside-civil-invest.pdf.

information and parameters that would allow the Bureau to issue an informed and appropriate modification of the CID. For this reason, the CID cannot be modified to encompass a sampling approach at this time, and the modification request is, accordingly, denied. Nevertheless, Firstsource is encouraged to provide additional relevant information that may assist Bureau staff in modifying the CID in this fashion, and the Assistant Director for Enforcement or Deputy Enforcement Director, as appropriate, may adopt such an approach.

Additionally, Firstsource argues that the CID is improper because some of the recordings requested are “time-barred” under 15 U.S.C. § 1692k(d). Pet. at 37. Firstsource did not raise this issue during the meet-and-confer process, and, as noted above, the Bureau may consider only issues raised during the meet-and-confer process. *Id.* Firstsource’s request that the CID be revised to exclude so-called “time-barred accounts” is therefore denied. Pet. at 40. However, even if the Bureau could now consider this request for modification, the request would likewise be denied. The Supreme Court has noted that the term “relevant” has been given “generous construction” by reviewing courts, and that “ ‘virtually any material that might cast light on the allegations’ ” is relevant. *McLane Co. v. EEOC*, 137 S. Ct. 1159, 1165 (2017) (quoting *EEOC v. Shell Oil Co.*, 466 U.S. 54, 68 (1984)); *cf. United States v. Golden Valley Elec. Ass’n*, 689 F.3d 1108, 1113–14 (9th Cir. 2012) (“We ‘must enforce administrative subpoenas unless the evidence sought by the subpoena is plainly incompetent or irrelevant to any lawful purpose of the agency.’ ”). Even assuming for the sake of argument that potential claims under the FDICPA are time barred, Firstsource’s argument still would not prevail. The Notification of Purpose makes it clear that the Bureau is also investigating whether there have been violations of the CFPA, which features a statute of limitations providing that, with certain exceptions, “no actions may be brought under [Title X of the CFPA] more than 3 years after the date of discovery of the violation to which an action relates.” 12 U.S.C. § 5564(g)(1). Thus, if the violation has not yet been discovered, then the statute of limitations has not begun to run. And here, the Bureau seeks the recordings in question to determine (and discover) whether there has been a violation.

Firstsource concludes its discussion of modifying the CID by requesting that Interrogatories 3, 4, and 5 be deleted. Pet. at 39. However, Firstsource provides no additional argumentation or analysis as to why the Bureau should do so, and, in fact, there is no fifth interrogatory. Without additional information, and since the Requests for Tangible Things remain unmodified, the Bureau has no basis on which to grant Firstsource’s request to delete Interrogatories 3 and 4.

II. FIRSTSOURCE’S REQUEST FOR CONFIDENTIAL TREATMENT

Firstsource requests confidential treatment for its Petition and this Order. Under the framework the Bureau has set forth for evaluating requests for confidential treatment, Firstsource has failed to demonstrate good cause for omitting these materials from the public record in their entirety. However, though not argued by Firstsource, there is good cause to justify redacting certain confidential information. Firstsource also requests confidential treatment of the First and Second CIDs. Pet. at 40. These materials are not included in, or attached as exhibits to, either the Petition or this Order. It is therefore unnecessary to consider these materials.

The Bureau’s regulations governing investigations provide that a petition to modify or set aside a CID and the Bureau’s order in response thereto are “part of the public records of the Bureau unless the Bureau determines otherwise for good cause shown.” 12 C.F.R. § 1080.6(g). As the Bureau has explained, a petitioner bears the burden of demonstrating good cause that its petition should not be made public. *See In re Great Plains Lending, LLC*, 2013-MISC-Great

Plains Lending-001 (Sept. 26, 2013),⁵ at 2; *In re Zero Parallel, LLC*, 2016-MISC-Zero Parallel-0001 (July 1, 2016),⁶ at 2; see also *Martin Marietta Corp. v. Dalton*, 974 F. Supp. 37, 40 n.4 (D.D.C. 1997) (“In ‘reverse-FOIA’ cases, the party seeking to prevent a disclosure the government itself is otherwise willing to make assumes that burden”). This standard mirrors that of the Federal Trade Commission, see 16 C.F.R. § 4.9(c)(1), and is consistent with the “general policy favoring disclosure of administrative agency proceedings.” *FCC v. Schreiber*, 381 U.S. 279, 293 (1965) (affirming agency authority to promulgate a rule generally requiring public disclosure of investigative information).

In evaluating whether a petitioner has shown “good cause” under 12 C.F.R. § 1080.6(g) to warrant withholding a petition and responsive order from the public record, the Bureau generally looks to the standards for withholding material from public disclosure established by the Freedom of Information Act (“FOIA”).⁷ See *In re Heartland Campus Sols., ECSI*, 2017-MISC-Heartland Campus Solutions, ESCI-001 (Sept. 8, 2017),⁸ at 9. Accordingly, the Bureau will publicly disclose a petition to modify or set aside a CID unless either (i) the petitioner has made a factual showing that the information in the petition falls within one of the FOIA exemptions or (ii) the Bureau determines that there exists other good cause to withhold all or a portion of the petition from public disclosure and the withheld information is not otherwise required by law to be made public.

As grounds for its request, Firstsource notes that the materials contain (1) confidential supervisory information (“CSI”); (2) confidential investigative information (“CII”) relating to the Bureau’s investigation of Firstsource and other supervised financial institutions; (3) personally identifiable information (“PII”), consisting of consumers’ last names and account numbers in the CID; and (4) sensitive commercial information regarding the business relationships between Firstsource and other supervised financial institutions. Pet. at 40–41. With respect to the last category, the Petition does not name any entities with which Firstsource has a business relationship; Firstsource has replaced the names of its clients with “Client A” and “Client B.” See, e.g., Pet. at 17. This Order likewise does not mention the names of those institutions. The PII in question is contained only in the CID itself, not in the Petition or this Order. Since the CID would not become part of the public record upon the publication of Firstsource’s Petition and this Order, there is therefore no need to address these categories further.

Firstsource does not elaborate on what information it wants shielded from disclosure as CII. Neither Firstsource’s Petition nor this Order extensively discusses CII, beyond identifying Firstsource. Though the Bureau’s investigations are generally non-public, see 12 C.F.R. § 1080.14(b), there is a specific prescription regarding public disclosure of petitions to set aside or modify CIDs under 12 C.F.R. § 1080.6(g). Firstsource’s request for confidential treatment on the basis that the materials contain CII is therefore unpersuasive.

⁵ http://files.consumerfinance.gov/f/201309_cfpb_decision-on-petition_great-plains-lending-to-set-aside-civil-investigative-demands.pdf.

⁶ https://www.consumerfinance.gov/documents/713/Zero_Parallel_confidentiality_decision_6-30-16_FINAL_with_signature.pdf.

⁷ It is appropriate for the Bureau to use FOIA as a guidepost for evaluating the “good cause” in its own regulation because FOIA is a comprehensive, practical, and widely-used statutory framework for assessing the confidentiality of information submitted to federal agencies, and it is already incorporated into the Bureau’s disclosure regulations. Application of FOIA standards to requests for non-public treatment of petitions also avoids potential inconsistencies whereby information in a petition deemed non-public under a different standard would nevertheless be subject to disclosure pursuant to a FOIA request.

⁸ https://www.consumerfinance.gov/documents/5566/201709_cfpb_heartland-campus-solutions_decision-and-order-on-petition.pdf.

With respect to the CSI at issue, although Firstsource's Petition did not identify a relevant FOIA exemption, FOIA exemption 8 protects from disclosure information "contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions." 5 U.S.C. § 552(b)(8). In addition, consistent with 12 C.F.R. § 1080.6(g), the Bureau retains discretion to withhold portions of a petition from public disclosure when there is good cause and when the withheld information is not otherwise required by law to be disclosed. In this case, and based on these considerations, there is good cause to redact those portions of the Petition that contain CSI. Redactions proposed by Firstsource that do not contain CSI are unnecessary.

This Order contains no such CSI and will be produced without redaction.

CONCLUSION

For the foregoing reasons, Firstsource's Petition is denied. Within fourteen calendar days of this Order, Firstsource is directed to produce all responsive documents, items, and information within its possession, custody, or control that are covered by the CID. Firstsource is welcome to engage in discussions with Bureau staff about any further suggestions for modifying the CID or staggering production, which may be adopted by the Assistant Director for Enforcement or Deputy Enforcement Director, as appropriate. In particular, as noted above, Firstsource is encouraged to engage with Bureau staff in discussions regarding a sampling approach to enable the Bureau to issue an informed and appropriate modification of the CID.

Firstsource's request for confidential treatment of the Petition is granted in part and denied in part. Its request for confidential treatment of this Order is denied. In order to furnish Firstsource with an opportunity to consider its response to this Order, notice is hereby given that neither this Order nor a redacted Petition shall be published until at least five calendar days from the date of this Order.


Mick Mulvaney, Acting Director

July 23, 2018