



QC HOLDINGS, INC.  
9401 Indian Creek Parkway, Suite 1500  
Overland Park, KS 66210

Matt Wiltanger  
Vice President – General Counsel

(913) 234-5000  
matt.wiltanger@qchi.com

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Chairman Robert Kenney  
Public Service Commission  
The State of Missouri  
200 Madison St.  
P.O. Box 360  
Jefferson City, MO 65102

RE: File #AW-2014-0329

Dear Chairman,

In response to the Public Service Commission's solicitation for comments regarding billing and payment standards for Missouri utility consumers, we would like to submit information about our industry, our customers and our products and services.

The Community Financial Services Association (CFSA) was founded in 1999 to ensure consumer confidence in the short-term "payday" lending industry. CFSA member companies represent more than 300 Missouri short-term loan centers.

CFSA members QC Holdings, Advance America and Check Into Cash are the largest providers of short-term "payday" loans in the state. All three companies serve as an agent for third parties that accept utility payments on behalf of a variety of utility companies. QC, for example, via its Moneygram service, accepts payments for utility bills in about 85 of our 100 Missouri branches.

If it is the Commission's opinion that Missouri consumers should pay no additional fees when making utility payments, we have no objection to this proposal. However, we strongly contest the unsupported opinion that payday loan stores are taking advantage of bill pay customers. As noted below, there is almost no overlap between bill pay customers and payday loan customers.

For all three companies, the offering of short-term loans and the accepting of utility bill payments are two entirely separate transactions that in no way are connected to each other. Very few utility payment customers take payday loans, and the average

\$1 fee the lenders collect for each utility payment does not cover the costs of offering them.

Consumers typically use such services to pay their utility bills because they do not have checking accounts. Because payday loan customers are required to have checking accounts, there is almost no overlap among customers.

Short-term lenders offer utility bill-pay service as a convenience for consumers, at times upon the request of utilities themselves. Our bill-pay service is sometimes the most convenient, efficient and cost-effective way for a utility customer to pay his or her bill, and many are using it to avoid late payment and utility shut-off fees. They also avoid the costs associated with postage and money orders.

While offering utility bill-payment service is not a significant source of revenue or profit, short-term lenders would like the Commission to take this information under consideration. Do not hesitate to contact QC Holdings Vice President-Operations Scott Smith or myself if you have further questions.

Sincerely,



Matt Wiltanger  
Vice President – General Counsel