

**INTERPRETIVE LETTER 88-4 (SEPTEMBER 27, 1988)**

**State bank's proposed collection services do not constitute activities of a bill collection agency.**

Thank you for your letter dated \*, detailing specific activities that \* intends to engage in as a result of its proposed check-collection services for customers. This letter is addressed to you in response to your request as to the feasibility of the bank offering such services to its customers.

Overall, it appears that the bank is clearly permitted to offer its proposed check-collection service to its customers. According to your letter, the bank would only engage in these services to the extent of making phone calls and, if needed, personal visits in order to collect upon returned checks for customers. You stated that you would not be conducting the traditional function of a bill collection agency, which would involve further actions up to and including the filing of suit. It appears that such activities would really constitute extensions of services traditionally offered by your bank and permissible under Illinois banking law.

Be advised that this letter addresses only those activities specifically mentioned in your previous correspondence. No other services are addressed by this letter, even though they may be similar in nature to those mentioned in your correspondence.