



QC Holdings Companies  
9401 Indian Creek Pkwy., Suite 1500  
Overland Park, KS 66210  
Phone: 913.234.5000  
Fax: 913.234.5500

---

April 14, 2016

Washington State Department of Financial Institutions  
Consumer Services Division  
Sara Rietcheck  
150 Israel Rd. SW, POB 41200  
Olympia, Washington 98504-1200

Re: Washington Check Cashers and Sellers Act; Rulemaking CR-102

Ms. Rietcheck:

My name is Thomas C. Witherspoon. I am corporate counsel for QC Holdings, Inc., parent company to QC Financial Services, Inc., a licensed small loan lender under the Washington Check Cashers and Sellers Act (the "Act") operating as "Quik Cash" (hereinafter, "QC," "we," and "us"). I am writing to you about a proposed rulemaking by the Washington State Department of Financial Institutions, Consumer Services Division (the "DFI") pursuant to the Act. The deadline, as reported on the DFI website, for commenting on the proposed Rulemaking CR-102 is April 15, 2016. In this letter, I intend to comment on the proposed rulemaking on behalf of QC.

We wish to comment on the proposed change to Washington Administrative Code section 208-630-520(4)(b). Generally, section 208-630-520 requires particular terms in an installment plan. Paragraph (4)(b) would be a new addition to this section, requiring, for an installment plan with a term of 90 to 180 days, "at least one payment in each thirty day period." We recommend that the DFI reconsider this language.

Customers paid monthly may wish for their installment payments to be scheduled after each monthly pay date. If the proposed rulemaking requires "at least one payment in each thirty day period," then, in any month with greater than 30 days, we would not be able to meet that request, which may affect the customer's ability to pay on the required due date.

To avoid this scenario, we recommend that the DFI change the quoted language to "at least one payment in each month" or "at least one payment in each thirty-one day period."

Thank you for the opportunity to comment on this proposed rulemaking.

Sincerely,



Thomas C. Witherspoon  
Manager of Legal Affairs  
QC Holdings, Inc.  
9401 Indian Creek Pkwy., #1500  
Overland Park, Kansas 66210  
Phone: (913) 234-5032  
Fax: (913) 234-5532  
thomas.witherspoon@qchi.com

Cc: Tracy Ward  
Regional Director, Washington  
QC Holdings, Inc.  
9401 Indian Creek Pkwy., #1500  
Overland Park, Kansas 66210  
tracy.ward@qchi.com

Matt Wiltanger  
Chief Compliance Officer and General Counsel  
QC Holdings, Inc.  
9401 Indian Creek Pkwy., #1500  
Overland Park, Kansas 66210  
Phone: (913) 234-5210  
Fax: (913) 234-5710  
matt.wiltanger@qchi.com