

Creditors Interchange Receivables Management, LLC

**P.O Box 309
1137 Old York Road
Abington, PA 19001**

**Phone: 716-614-7523
Toll Free: 800-545-2795
Fax: 215-887-2206**

November 19, 2009

09-BK-007

Peter J. McCabe, Secretary
Administrative Office of the United States Courts
Thurgood Marshall Federal Judiciary Building
Washington, DC 20544

RE: Response to Proposed Rule Change: Bankruptcy Rule 3001

Dear Mr. McCabe:

I am a Vice President for an account receivables management company and have had management oversight of filing unsecured consumer claims for over twenty five years.

I am concerned about the proposed rule change 3001 and while I understand its intended purpose is to preserve the integrity of the bankruptcy system, I do not agree the amendment is needed for additional requirements to file an unsecured proof of claim. The penalty for filing unresponsive proofs of claim is clearly covered by 18 USC Sections 152 and 3571. As you know, these are indicated on form B10 (Official Form 10).

I further agree the obligation to properly evidence any unsecured debt is a legal obligation for any entity filing a proof of claim, but also a legal obligation for a debtor to properly list outstanding unsecured debts in their bankruptcy schedules. There are current rules that allow the reasonable dispute of an unsecured claim filed.

Again, I understand the preservation of integrity of the bankruptcy system for those who participate should be bound to accuracy of a proof of claim. I do not, however, agree that the proposed Bankruptcy Rule 3001 should replace the existing requirements of unsecured proof of claim filing presently under existing bankruptcy law and rules including the penalties under the federal statutes 18 USC Sections 152 and 3571.

I wish to testify at the current hearings scheduled with preference to the hearing on February 5, 2010 in New York on this specific rule.

Respectfully yours,

Raymond P. Bell, Jr.
Vice President
Creditors Interchange Receivables
Management, LLC