



Selective Direct Mail Campaign

Answer by Andy Zavoina, BOL Guru

Question: A lender wants to mail out postcards to a few ZIP codes around our location which invite people to come in for "no cost home improvement loans" due to recent flooding that affected only certain ZIP codes. If we do a mailing, do we need to mail to "all" addresses in the ZIP code, or can we look at the population size and then randomly select every third name/address or what?

Answer: You can and should be selective in who, where you send mail. This is easy to do and reduces costs and raising your ROI.

Selective Mailings, Discriminatory or Not

Answer by Jim Bedsole, BOL Guru

Question: We would like to mail out an informational flyer describing our new Home Equity Line of Credit Product to our customers that we have retained the servicing for secondary market loans. We do not want to send the flyers out to all of our customers at this time, since we feel that the majority of our portfolio loans would not qualify for this product. Will this be a discrimination issue, if we only send the notices out to our secondary market customers?

Answer: Discrimination on the basis of whether they are a portfolio loan or a secondary market loan is not illegal. There is a possibility, depending on the demographics of your portfolio customer base vs your secondary market loan customer base, that you could get into disparate impact discrimination. Check to make sure there aren't significant differences in the race, age, marital status, and other protected class criteria between these two groups. If there are not significant differences, you should be OK.