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National Association of Federally-Insured Credit Unions

January 23, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, D.C. 20554

RE: *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*
(CG Docket No. 17-59)

Dear Ms. Dortch:

On behalf of the National Association of Federally-Insured Credit Unions (NAFCU), the only national trade association focusing exclusively on federal issues affecting the nation's federally-insured credit unions, I am writing in regard to the Federal Communications Commission's (FCC) efforts related to the November 17, 2017 *Report and Order and Further Notice of Proposed Rulemaking*. NAFCU is pleased that the FCC is taking important steps to enhance the ability of voice service providers to block unwanted and illegal robocalls. NAFCU stresses the importance of targeting the bad actors engaged in such activities while recognizing that small, community-based, cooperative financial institutions, like credit unions, play no part in such illegal communications. Credit unions do not harass consumers; their communications are simply an attempt to inform their members about essential financial information on their existing accounts.

Unfortunately, since the FCC's July 10, 2015 Declaratory Ruling and Order (the 2015 Order) on the *Telephone Consumer Protection Act* (TCPA), credit unions have faced challenges in even providing their members with important informational calls. Therefore, NAFCU encourages the FCC to continue the rulemaking process aimed at eliminating unlawful robocalls and is hopeful that once pending litigation is resolved, the FCC will take steps to undo some of the harmful effects of the 2015 Order as well as provide more clarity and flexibility to the confusing and antiquated TCPA. Credit unions deserve relief so that they may contact their members about important information regarding their accounts without a risk of costly, frivolous litigation.

NAFCU would also like to reiterate its support for the FCC's other efforts to target illegal robocalls, specifically its evaluation of the creation of a reassigned numbers database. NAFCU and its member credit unions encourage the FCC to move forward with a rulemaking to create a centralized database of reassigned numbers that permits credit unions access at little or no cost. Such a rulemaking will help to alleviate one of the industry's primary concerns stemming from the 2015 Order by allowing credit unions to verify reassigned numbers, thereby helping them avoid liability under the TCPA.

Federal Communications Commission

January 23, 2018

Page 2 of 2

Conclusion

NAFCU appreciates the opportunity to comment on the FCC's efforts to curb unlawful robocalling and is eager to continue this dialogue with you regarding the modernization of the TCPA. If you have any questions or concerns, please do not hesitate to contact me at (703) 842-2212 or akossachev@nafcu.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Kossachev". The signature is fluid and cursive, with the first name "Ann" and last name "Kossachev" clearly distinguishable.

Ann Kossachev
Regulatory Affairs Counsel