

July 2, 2020

***Via ECFS***

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

**Re: Letter and Notice of *Ex Parte* Presentations, CG Docket No. 17-59**

The American Bankers Association, ACA International, American Association of Healthcare Administrative Management, American Financial Services Association, Consumer Bankers Association, Credit Union National Association, Mortgage Bankers Association, National Association of Federally Insured Credit Unions, and the Student Loan Servicing Alliance (the “Associations”) appreciate the opportunity to comment on the draft Third Report and Order released on June 25, 2020 (Draft Order).<sup>1</sup> The Draft Order provides a safe harbor for telephone companies (voice service providers) that block calls based on “reasonable analytics designed to identify unwanted calls,” as long as the analytics incorporates call authentication information into the blocking decision.

This letter also serves as notice of *ex parte* telephone calls with Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Ajit Pai on June 30, 2020, and with Arielle Roth, Wireline Legal Advisor to Commissioner Michael O’Rielly on July 1, 2020. The participants to the meetings are identified in the appendix attached to this letter.

The Associations share the Commission’s goal to eliminate illegal automated calls. At the same time, it is critical that the Commission’s rules governing call-blocking practices protect consumers from the risk that they might not receive important, often time-sensitive, calls from health care providers, finance companies, banks, credit unions, other participants in the financial services marketplace, retailers, and other legitimate businesses. When outbound calling numbers used by legitimate businesses are mislabeled, or calls from those numbers are blocked, consumers are harmed because they may not receive lawful calls affecting their health, safety, or financial well-being. These calls include, for example, safety alerts, fraud alerts, data security breach notifications, product recall notices, healthcare and prescription reminders, power outage updates, and other necessary account updates needed to maintain financial health. It is critical for consumers that these calls be completed without delay, and that the caller and call recipient are notified immediately when a call is blocked. When those calls are blocked, the Commission’s rules should ensure that businesses can promptly have the block removed.

We offer the following comments that, if adopted, would strengthen the Draft Order’s protections for both consumers and callers.

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking, CG Docket 17-59, FCC-CIRC2007-02 (“Draft Order”).

## Summary of Comments

We appreciate that the Draft Order mandates that voice service providers provide a single point of contact on their websites, resolve disputes within a reasonable amount of time, and promptly remove blocks where there is erroneous blocking.<sup>2</sup> However, for this redress mechanism to meaningfully protect consumers and be effective as Congress intended, the caller must know that its calls are being blocked. Consequently, we urge the Commission to require the blocking entity to notify callers immediately that it is blocking their calls. Without a notification requirement, no call-blocking service can be performed with “transparency . . . for . . . callers,” as the TRACED Act requires.<sup>3</sup>

We also ask that the Commission take the following steps to strengthen the ability of the Draft Order to protect consumers against illegal calls and ensure that all stakeholders have the incentive to avoid over-blocking time-sensitive, legitimate calls on which consumers rely today:

- The Commission should require a voice service provider to remove an erroneous block within 24 hours of the provider’s learning of the block.
- The Commission should clarify and confirm that a terminating service provider that blocks calls is prohibited from imposing a charge on callers for reporting, investigating, resolving, and, as appropriate, removing erroneous blocks promptly.
- The Commission should confirm that the obligation on terminating voice service providers to provide callers with effective redress options applies equally to mislabeled outbound calling numbers.
- The Commission should confirm that implementing the required redress mechanism is a condition of receiving the protections of the safe harbor.

In addition, terminating voice service providers should not be able to block a fully authenticated call unless the provider can determine with a high degree of certainty that the call is unlawful through application of objective, defined criteria, *and* after investigation into the call.

### **Companies’ Outbound Calling Numbers Used to Place Lawful and Important Calls Continue to Be Blocked or Mislabeled**

In prior comment letters, the Associations, and numerous others, have individually submitted data that demonstrated that phone numbers used by companies to place lawful and important outbound calls were being labeled as “Potential Spam,” “Suspected Spam,” “Spam Number,” “Nuisance Label,” or other derogatory label, and that calls from those numbers are being blocked.<sup>4</sup> Despite the Commission’s past encouragement that voice service providers develop a

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<sup>2</sup> Draft Order at ¶ 54.

<sup>3</sup> Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) § 10(b).

<sup>4</sup> *See, e.g.*, Letter from Jonathan Thessin, Am. Bankers Ass’n, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 17-59, WC Docket No. 17-97, (Jan. 29, 2020); Letter from Celia Winslow,

mechanism for notifying callers that their calls have been blocked,<sup>5</sup> many of our members report that they continue to experience widespread improper labeling of outbound calling numbers, blocking of calls, and difficulty identifying and remedying blocked calls.

For example, one large bank reported that in May 2020, a voice service provider's third party call-labeling service provider mislabeled a phone number used by the bank's automobile line of business as spam, resulting in the blocking of collections-related calls from that number. The bank learned about the mislabeling and erroneous blocking indirectly, not from the voice service provider or third party provider directly. The bank then had to investigate why the calls were not being completed. It took the bank over a week to resolve the mislabeling and erroneous blocking with the third party provider.

In another example, from November 2019, a large bank reported an increase in the number of outbound fraud-prevention, servicing, and collections-related calls being mislabeled as fraudulent in the recipient's caller ID display. As a result, many customers chose to block these calls. Moreover, the service provider does not notify banks or other businesses whose calls are blocked. The bank reported that 85% of its outbound call volume across multiple divisions was impacted.

The bank contacted the voice service provider, and although the inaccurate labels were removed, the numbers were labeled accurately for only a brief period of time. The algorithm soon re-

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American Financial Service Ass'n., to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 17-97 & 20-67 at 1-2 (May 15, 2020) ("AFSA May 15<sup>th</sup> Letter"). See also ABA et. al. Letter to Marlene Dortch, Secretary, FCC, CG Docket 17-59, WC Docket No. 17-97, (March 4, 2020) ("ABA et al. March 4, 2020 Ex Parte") (citing numerous examples in the record of erroneous call blocking and mislabeling); Number Sentry Calling Number Solutions, Accounts Receivable Management Outbound Calling Study, at 2 (Feb. 2020), *attached to* Reply Comments of ACA International, CG Docket No. 17-59, WC Docket No. 17-97 (filed Feb. 28, 2020) (showing that voice service providers blocked 21.3% of the nearly 225,000 lawful calls subject to the study); Comments of NENA: The 9-1-1 Association, CG Docket No. 17-59, WC Docket No. 17-97, at 2 (filed Jan. 29, 2020) (PSAPs "have also documented occurrences of being blocked"); Comments of Cox Communications, Inc., CG Docket No. 17-59, WC Docket No. 17-97, at 4 (filed Jan. 29, 2020) ("as third-parties and consumers use analytics or other measures to block specific inbound numbers without service provider interaction, there could be a possibility that call backs from a PSAP are inadvertently blocked"); Comments of INCOMPAS, CG Docket No. 17-59, at 3 (filed Jan. 29, 2020) (reporting blocking of anti-fraud messages for "two-factor authentication requests"); Comments of the National Opinion Research Center, CG Docket No. 17-59, at 5 (filed Jan. 29, 2020) (reporting blocking of "[r]esearch calls on behalf of the Center for Disease Control"); Comments of Numeracle, Inc., CG Docket No. 17-59, at 11 (filed Jan. 30, 2020) ("Numeracle Comments") (reporting blocking of "[c]ritical calls" relating to "life and safety"); Reply Comments of Twilio, CG Docket No. 17-59, at 7 (filed Feb. 28, 2020) ("Twilio Reply Comments") (reporting blocking of "[s]ecurity-related messages," including "real-time notifications about incidents that require rapid response").

<sup>5</sup> See *Advanced Methods To Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor, Declaratory Ruling and Third Further Notice of Proposed Rulemaking*, 34 FCC Rcd 4876, 4889, ¶ 38 (2019).

applied the incorrect label to the numbers, because the bank initiates a large volume of outbound calls from each number in a short period of time. It took the bank over two months to obtain a permanent solution with the provider to this occurrence of the mislabeling of the bank's outbound calling numbers.

These examples underscore the need for voice service providers to notify callers when their calls are blocked, as explained below.

### **Revising Redress Provisions to Comply with the TRACED Act**

We appreciate that the Draft Order requires that voice service providers that block calls provide a single point of contact on their websites, resolve disputes within a reasonable amount of time, and promptly remove blocks where there is a “credible claim” of erroneous blocking.<sup>6</sup> These provisions, however, fail to fully effectuate the requirements of the TRACED Act, which mandate that the Commission “ensure [that] robocall blocking services provided on an opt-out or opt-in basis ... are provided with transparency and effective redress options” for both consumers and callers.<sup>7</sup> The TRACED Act further requires that the establishment of a safe harbor for blocking voice service providers must be consistent with this requirement for transparency and effective redress.<sup>8</sup>

#### *The Commission Should Require a Blocking Notification*

Transparency requires notification, and any entity engaging in blocking must be required to notify callers that it is blocking their calls. The absence of a notification requirement in the Draft Order significantly reduces the effectiveness of the other redress requirements because the caller may never know, or may not learn in a timely manner, that its calls are being blocked and by which provider.

Blocking is not transparent if the caller does not know the blocking is occurring or who is performing it. This is similarly true for consumers – unless consumers are provided notice of the calls that will be blocked, they cannot make meaningful decisions about such blocking. Unless a caller learns, either through angry customers who did not receive the company's calls or other secondary means, that its legitimate calls are being blocked, the caller cannot know to trigger the redress option. As Congress recognized, these calls from legitimate companies “can have life or death consequences for the intended recipient.”<sup>9</sup> It is essential that voice service providers that engage in blocking notify callers when a call is blocked. Therefore, we ask that the Commission require that all voice service providers provide immediate notification of blocking.

The Draft Order also does not reflect Congress's directive that the Commission consider the burdens on callers from allowing blocking “without providing prior or contemporary notice to

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<sup>6</sup> Draft Order at ¶ 54.

<sup>7</sup> TRACED Act § 10(b) (establishing new subsection J to 47 U.S.C. § 227.)

<sup>8</sup> *Id.* at § 4(c)(2).

<sup>9</sup> S. Rep No. 116-41 at 2-3 (2019) (“Senate Report”). Congress recognized that the “majority of companies who use robocalls are legitimate companies” and that valid robocalls “can benefit consumers” by providing valuable, timely and often urgent information. *Id.*

the caller *and* an opportunity for the caller to rebut a blocking determination.”<sup>10</sup> Thus, Congress fully expected that a reasonable unblocking program would involve both notice to the caller and the opportunity for the caller to seek removal of the block. The Draft Order does not assess the burdens imposed on callers whose calls are being blocked without prior or contemporaneous notification. The record has provided ample evidence of these burdens.<sup>11</sup> Nor is the Draft Order consistent with Congress’s directive to “require voice service providers to unblock improperly blocked calls in as timely and efficient a manner as reasonable” so that “legitimate businesses and institutions conveying information to consumers are not unreasonably impacted by the TRACED Act” or unduly burdened by the unblocking process.<sup>12</sup> Callers cannot unblock calls in a timely or efficient manner if they do not know that their calls are being blocked and by which company.

These considerations are not addressed in the Draft Order, which summarily declares notification to be “unnecessary” and potentially “harmful” because it might tip off bad actors. The draft does not explain why informing callers that their calls are being blocked is “unnecessary” in the face of uncontroverted record evidence that callers have had great difficulty identifying who was blocking their calls and obtaining timely redress.<sup>13</sup>

The Draft Order’s assertion that notifying legitimate callers that their lawful and important calls are being blocked is harmful because it would “tip off” bad guys is equally unavailing. The assertion is belied by that fact that some providers do in fact provide real time notification that calls are being blocked. They presumably would not do so if they believed they were simply tipping off bad actors. The Consumer and Governmental Affairs Bureau, for example, recently released a report on the current status of call blocking that notes that several major carriers, including AT&T, Verizon and Cox, provide real-time notification.<sup>14</sup> Unfortunately, a number of other providers described in the Bureau’s report do not indicate that they are currently, or that they intend to provide, notification that they are engaged in blocking. Neither callers nor consumers are served by a patchwork approach whereby some providers promptly notify callers while many others refuse. The type of notification need not be uniform, but the requirement to provide notification of some sort should be a uniform condition of blocking.

Moreover, if being informed by a voice provider that it is not going to complete calls disqualifies blocking-related activities because “bad actors” would seek an alternative calling route, much of

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<sup>10</sup> *Id.* at 15 (emphasis added). As reflected in the above-quoted sentence, Congress contemplated that redress would have two components, notice and the ability to lift the block.

<sup>11</sup> *See, e.g.*, AFSA May 15<sup>th</sup> Letter at 2; Reply Comments of Encore Capital, CG Docket No. 17-59, WC Docket No. 17-97 at 5-6 (filed Feb. 28, 2020) (“Encore Reply Comments”); Twilio Reply Comments at 6-7.

<sup>12</sup> Senate Report at 15.

<sup>13</sup> *See* note 11 *supra*.

<sup>14</sup> Call Blocking Tools Are Now Available to Consumers: Report on Call Blocking, A Report of the Consumer and Governmental Affairs Bureau, FCC, CG Docket 17-59, June 2020 at 12 (Reporting that AT&T provides an intercept message that includes a number to call if the caller believes the block is erroneous); *id.* at 15-16 (Reporting that Cox provides calling parties an intercept message when calls are blocked). *See also id.* at 17 (noting Verizon provides a release code (Code 603-denied) when it blocks calls in its network).

the Draft Order would fail the test. For example, the Draft Order effectively requires voice service providers to stop serving customers sending unlawful traffic.<sup>15</sup> The initiator of the unlawful traffic is thereby notified that it must seek another provider if it intends to continue sending such traffic onto the network.

The Draft Order's blanket claim that notification is harmful also is without support in the record. The draft, for example, cites AT&T's reply comments, but those comments informed the Commission that AT&T in fact provides notification and that notification is "helpful to facilitate timely remediation of inadvertent blocking."<sup>16</sup> One commenter cited by the Draft Order suggests that requiring all providers to use *the same notification method* might tip off "bad actors."<sup>17</sup> We do not request that all voice service providers be required to provide notification through the same prescribed means. Instead, we advocate that providers have flexibility in how they meet the notification requirement.

The Draft Order's decision not to require notification is contrary to the TRACED Act's requirements (including, *e.g.*, the transparency and redress requirements) and is arbitrary and capricious. Thus, we reiterate our call for the Commission to include a flexible notification requirement that obligates terminating voice service providers that block calls to contemporaneously notify the caller that its calls are being blocked.

#### *Providing Redress within 24 Hours*

We appreciate that the Draft Order recognizes that erroneously blocked calls must be resolved promptly. However, permitting a voice service provider to resolve erroneous blocks "within a reasonable time that is consistent with industry best practice" provides no means to hold providers accountable for timely redress. We ask the Commission to require a voice service provider to remove the erroneous block within 24 hours of the provider's learning of the block. This requirement, for which there is strong support in the record, provides a workable period of time for the provider to remove the block, while reducing the harm to consumers and callers from the erroneous block.<sup>18</sup> It also ensures that providers are not able to effectively create their own standard for "reasonableness" by allowing the "industry standard" to extend over time.<sup>19</sup>

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<sup>15</sup> Draft Order ¶ 41.

<sup>16</sup> Reply Comments of AT&T, CG Docket No. 17-59, WC Docket No. 17-97 at 6 (filed August 23, 2019).

<sup>17</sup> Reply Comments of CTIA, CG Docket No. 17-59, WC Docket No. 17-97 at 11 (filed Feb. 28, 2020)..

<sup>18</sup> *See, e.g.*, ABA et al March 4, 2020 Ex Parte at 4; Twilio Reply Comments at 10; Comments of National Association of Federally-Insured Credit Unions, CG Docket No. 17-59, WC Docket No. 17-97 at 2 (filed Jan. 29, 2020); Encore Reply Comments at 5; Reply Comments of Sirius XM Radio Inc., CG Docket No. 17-59, WC Docket No. 17-97 at 7 (filed Feb. 28, 2020).

<sup>19</sup> The Associations are not aware of current industry best practices regarding redress, especially considering that these would be new Commission requirements. If the Commission decides to refer best practices, it should convene an appropriate forum to develop such practices and, consistent with Congressional intent, require that consumers and callers are able to participate in their development. Senate Report at 15 ("When establishing the process by which callers

### *Providing Redress at No Charge to Callers*

The TRACED Act is also clear that the redress mechanism must be made available to callers at “no additional charge to [the caller] for resolving complaints related to erroneously blocked calls.”<sup>20</sup> The Draft Order states that “any voice service provider that blocks calls must designate a single point of contact for callers, as well as other voice service providers, to *report blocking errors at no charge to callers* or other voice service providers.”<sup>21</sup> This sentence could be interpreted to require that callers not be charged for the cost of the voice service provider’s designation of a single point of contact on its website but potentially leaving some ambiguity as to whether other aspects of the redress process is to be without charge. However, the TRACED Act, as noted, requires that no charge be imposed for “resolving complaints,” not merely reporting them.<sup>22</sup> The Commission should clarify and confirm that a terminating service provider that blocks calls will not impose a charge on callers for reporting, investigating, resolving, and as appropriate, removing erroneous blocks.

### *The Commission Should Confirm that the Redress Mechanism is Available to Rectify Mislabeled Calls*

The record provides ample evidence that legitimate calling numbers are routinely mislabeled as “spam,” “likely spam,” or “scam.”<sup>23</sup> Mislabeled an outbound calling number is tantamount to blocking a call from that number, as very few calls will be answered with such adverse labels. The Commission should confirm that the obligation on terminating voice service providers to provide callers with effective redress options applies equally to mislabeled outbound calling numbers. Congress was clear that the redress mechanism required under the TRACED Act applies to both erroneously blocked calls and mislabeled calling numbers.<sup>24</sup>

### *The Commission Should Confirm that Implementing the Redress Mechanisms is a Condition of Obtaining the Protections of the Safe Harbors*

The TRACED Act expressly ties the creation of a safe harbor for voice service providers that erroneously block calls to the requirement that providers implement transparent and effective redress mechanisms. Specifically, section 4(c)(2) of the TRACED Act requires that the establishment of any safe harbor under this section must be “consistent with the regulations prescribed under” section 10(b), which include the requirement for establishing a redress mechanism. Therefore, the Commission should make clear in the order and its new rules that implementing the required redress mechanism is not only a regulatory obligation, but is a condition of receiving the protections of the safe harbor.

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may have their calls unblocked, the FCC should consult call originators in addition to voice service providers.”)

<sup>20</sup> TRACED Act § 10(b).

<sup>21</sup> Draft Order ¶ 54 (emphasis added).

<sup>22</sup> TRACED Act § 10(b) (emphasis added).

<sup>23</sup> See, e.g., Numeracle Jan. 29, 2020 Comments at Appendix A (describing numerous examples of legitimate calls being mislabeled). See also supra n. 4.

<sup>24</sup> Senate Report at 15 (“The safe harbor should not be used to support blocking or mislabeling calls from legitimate businesses.”)

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To address the redress issues described above, we propose to revise paragraphs 54 and 58 and draft rule 64.1200(k)(3) & (8) as follows:

54. *Point of Contact for Blocking Disputes. Redress Mechanism for Blocking or Mislabeling Disputes.* We require that any voice service provider that blocks calls immediately notify the caller that the provider is blocking its calls. We further require that any voice service provider that blocks calls must designate a single point of contact for callers, as well as other voice service providers, to report and resolve blocking errors at no charge to callers or other voice service providers. Blocking providers must investigate and resolve these blocking disputes in a reasonable amount of time that is consistent with industry best practice. **within 24 hours of receiving a complaint that the call is being erroneously blocked or labelled and at no charge to the caller.** What amount of time is “reasonable” may vary depending on the specific circumstances of the blocking and the resolution of the blocking dispute. Blocking providers must also publish contact information clearly and conspicuously on their public-facing websites. We further require that when a caller makes a credible claim of erroneous blocking and the voice service provider determines that the calls should not have been blocked, a voice service provider must promptly cease blocking calls from that number unless circumstances change. **In addition to outright blocking, the redress mechanisms set forth in this paragraph apply to voice service providers that terminate calls with adverse labels such as spam, likely spam or scam calls. Finally, we confirm that implementation of these redress mechanisms is a condition of obtaining the protections of the safe harbors we establish in this order.**

64.1200

(k) Voice Service providers may block calls so that they do not reach a called party as follows:

(3) A terminating provider may block a voice call without liability under the Communications Act or the Commissions rule where:

**(vii) The terminating provider provides, without charge to the caller, the redress requirements set forth in subparagraph (8).**

(8) Any terminating provider blocking pursuant to this subsection must **immediately notify the caller that the provider is blocking its calls**, provide a single point of contact, readily available on the terminating provider’s public-facing website, for handling call blocking error complaints and must resolve disputes **within a reasonable time within 24 hours**. When a caller makes a credible claim of erroneous blocking and the terminating provider determines that the calls should not have been blocked, the terminating provider must promptly cease blocking calls from that number unless circumstances change. **The terminating provider may not impose any charge on callers for reporting, investigating, or resolving blocking error complaints. For purposes of this subparagraph, blocking includes attaching adverse labels to calls.**

In addition, paragraph 58 should be revised as follows:

58. *Other Protections.* We decline at this time to require other protections we sought comment on in the *Call Blocking Declaratory Ruling and Further Notice* ~~such as requiring voice~~



service providers to send SIP or Integrated Services Digital Network User Part codes when calls are blocked.<sup>132</sup> Though many commenters, particularly those placing calls, supported extensive protections,<sup>133</sup> others argued that these protections are unnecessary and potentially harmful.<sup>134</sup> While additional protections may benefit lawful callers, they also have the potential to tip off bad actors and help them circumvent call blocking technologies.<sup>135</sup> We agree with commenters that support allowing voice service providers flexibility to determine which specific mechanisms they wish to use.<sup>136</sup>

### **Blocking Fully Authenticated Calls**

The Draft Order permits voice providers to block calls that have been fully authenticated under the STIR/SHAKEN framework if reasonable analytics otherwise indicate the calls may be suspect. This approach undermines the central role that call authentication should play in determining which calls may be blocked. A terminating voice service provider should only be permitted to block a call that has an A-level attestation under the STIR/SHAKEN framework after the provider has determined with a high degree of certainty that the call is unlawful through application of objective, defined criteria, *and* after investigation into the call.

We recognize that not all fully authenticated calls will be lawful. Nevertheless, there should be a strong presumption of lawfulness attached to an “A” level attestation in which the originating voice service provider affirms that it knows the customer making the call and that the customer has a right to use the number showing up on the caller ID. Rather than empowering a voice service provider to block such a call immediately based on reasonable analytics, the provider should first undertake reasonable due diligence, such as contacting the caller or its originating voice provider to assess whether the call in fact warrants being blocked or adversely labeled. We propose the following revision to paragraph 31 of the Draft Order:

31. As a further example, if terminating voice service providers normally see calls from a particular number coming in with “A” attestation, but calls from that number abruptly change to a different attestation level or no attestation and analytics indicate that the calls are likely to be unwanted, a terminating voice service provider may choose to only block the calls without “A” attestation and allow the “A” attested calls from that number to complete for as long as the trend continues. If the terminating voice service provider has identified that calls with “A” attestation previously originating from that number are nevertheless illegal based on reasonable analytics, they may block those calls despite the attestation level, **provided that the terminating voice service provider first conducts an investigation, such as contacting the originating service provider, to reasonably determine that the call is unlawful.** Terminating providers may also consider when a call fails the verification process. These are merely examples; the safe harbor is contingent upon incorporating caller ID authentication information into reasonable analytics, but is not contingent on doing so in particular, predefined ways.

Thank you for your consideration of these comments.

Sincerely,

American Bankers Association  
ACA International

American Association of Healthcare Administrative Management  
American Financial Services Association  
Consumer Bankers Association  
Credit Union National Association  
Mortgage Bankers Association  
National Association of Federally Insured Credit Unions  
Student Loan Servicing Alliance

## Appendix A

### Meeting Attendees

Office of Chairman Ajit Pai – June 30, 2020

Zenji Nakazawa

#### Associations

Blake Chavis, Mortgage Bankers Association

Stephen Congdon, Consumer Bankers Association

Leah Dempsey, ACA International

Mark Brennan, Hogan Lovells (Counsel for the American Association of Healthcare Administrative Management)

Elizabeth Eurgubian, Credit Union National Association

Elizabeth LaBerge, National Association of Federally-Insured Credit Unions

Jonathan Thessin, American Bankers Association

Celia Winslow, American Financial Services Association

Michael Pryor, Brownstein Hyatt Farber Schreck (Counsel for the Credit Union National Association)

Office of Commissioner Michael O’Rielly – July 1, 2020

Ariella Roth

#### Associations

Scott Buchanan, Student Loan Servicing Alliance

Stephen Congdon, Consumer Bankers Association

Leah Dempsey, ACA International

Mark Brennan, Hogan Lovells (Counsel for the American Association of Healthcare Administrative Management)

Elizabeth Eurgubian, Credit Union National Association

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Jonathan Thessin, American Bankers Association

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