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**VIA ELECTRONIC FILING**

October 24, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: **In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991; Petition of AmeriCredit Financial Services Inc. d/b/a GM Financial for Waiver; CG Docket No. 02-278**

Dear Ms. Dortch:

On behalf of GM Financial, this *ex parte* letter memorializes a meeting on October 22, 2019 between the undersigned and Kathleen Scott of Wiley Rein, LLP, on behalf of AmeriCredit Financial Services Inc. d/b/a GM Financial ("GM Financial"), and Kurt Schroeder and Richard Smith (who joined via telephone) of the Consumer and Governmental Affairs Bureau ("Bureau"). The purpose of the meeting was to discuss GM Financial's pending Petition for Waiver ("Petition"), which seeks a limited waiver of Section 64.1200(b)(1) of the Commission's rules to allow GM Financial to use its authorized "doing business as" ("DBA") name—GM Financial—instead of its legacy name—AmeriCredit Financial Services Inc. ("AmeriCredit")—when placing artificial or prerecorded voice calls.

During the meeting, we discussed the arguments contained in the Petition regarding why allowing GM Financial to use only its DBA name when placing artificial or prerecorded voice calls will better serve the public interest and the Commission's policy objectives. In particular, we emphasized that GM Financial is the company's authorized DBA name in all fifty states, plus Guam, Puerto Rico, and the U.S. Virgin Islands, and that given the volume of GM Financial's state licenses—the company holds 809 state financial services licenses, and an additional 47 state insurance licenses—it would be a burdensome and costly task to change the legacy name associated with those licenses to GM Financial. We also highlighted that the Petition is ripe for resolution and fully consistent with recent precedent.

Additionally, this *ex parte* letter provides a response to a Bureau staff inquiry during the October 22, 2019 meeting concerning consumer confusion arising from the use of both the AmeriCredit legacy name and the GM Financial DBA name together. Specifically, immediately after General Motors Company acquired AmeriCredit's parent company in 2010, customer correspondence was often dual branded, using both the AmeriCredit and GM Financial names, to assure that customers became familiar with the company's new DBA name and logo. There were incidents of customer confusion regarding the dual branding that GM Financial had to

Ms. Marlene Dortch  
October 24, 2019  
Page 2

address at that time. Further, state regulators asked questions and expressed concern about the use of dual branding expressly because of the potential for customer confusion. As a result, GM Financial intentionally eliminated references to AmeriCredit from all customer correspondence after the initial Welcome Letter is sent. Grant of the Petition will allow GM Financial to align its communications with customers via artificial or prerecorded voice calls with such communications made through other means.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact the undersigned with any questions concerning this matter.

Respectfully submitted,

/s/ Eve K. Reed

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Cc (via email): Kurt Schroeder ([kurt.schroeder@fcc.gov](mailto:kurt.schroeder@fcc.gov))  
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