



April 4, 2019

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Presentation – CG Docket Nos. 02-278, 18-152**

Dear Ms. Dortch:

On April 1, 2019, Harold Kim, Chief Operating Officer for the U.S. Chamber Institute for Legal Reform, Matthew D. Webb, Senior Vice President for Legal Reform Policy for the U.S. Chamber Institute for Legal Reform, and Doug Wiley, Partner, TCH Group, (collectively known as ILR) met with Chairman Ajit Pai and Zenji Nakazara, Legal Advisor for Public and Consumer Protection, to discuss issues related to the Telephone Consumer Protection Act of 1991 (TCPA) and the pending petition for a declaratory ruling on automatic telephone dialing systems (ATDS).<sup>1</sup>

ILR explained it has heard from many of its members that they face an increased amount of abusive TCPA litigation due to a lack of clarity around what constitutes an ATDS. ILR discussed the need for the Commission to expeditiously issue a declaratory ruling to clarify the TCPA's definition of ATDS, and the positions taken in ILR's petition for declaratory ruling and in its comments on the FCC's regulatory proposals. ILR also discussed the state of the record and the potential timing for consideration of regulatory action.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Harold Kim', written over a light blue horizontal line.

Harold Kim  
Chief Operating Officer  
U.S. Chamber Institute for Legal Reform

cc: Matthew D. Webb  
Doug Wiley

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<sup>1</sup> Telephone Consumer Protection Act, Pub. L. No. 102-243, 105 Stat. 2394 (1991), codified at 47 U.S.C. § 227 (TCPA).