April 20, 2020

*Via ECFS*

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

Re: Joint Trades Petition for TCPA Exemption (CG Docket No. 02-278)

Dear Ms. Dortch:

Quicken Loans is pleased to submit comments to the Federal Communications Commission’s (FCC or Commission) on the Joint Trade petition requesting an expedited declaratory ruling, clarification, or waiver filed for an exemption on Telephone Consumer Protection Act (TCPA) financial services calls and texts made during the COVID-19 pandemic.¹ We thank the Commission for the opportunity to comment, appreciate the Joint Trades leadership on behalf of the industry, and support the Petition.

**ABOUT QUICKEN LOANS**

Detroit-based Quicken Loans is the nation’s largest home mortgage lender. The company closed $145 billion of mortgage volume across all 50 states in 2019. In late 2015, Quicken Loans introduced Rocket Mortgage, the first fully digital mortgage experience. Today, 98% of all home loans originated by Quicken Loans utilize Rocket Mortgage Technology.

Quicken Loans moved its headquarters to downtown Detroit in 2010. Today, Quicken Loans and its affiliated companies employ more than 18,000 full-time team members in Detroit’s urban core, and are deeply invested in improving the well-being of the City and its residents. The company originates high-quality mortgage loans from web centers located in Detroit, Cleveland, and Phoenix. Quicken Loans also operates a centralized loan processing facility in Detroit. Quicken Loans ranked highest in the country for customer satisfaction for primary mortgage origination by J.D. Power for the past ten years, 2010 – 2019, and also ranked highest in the country for customer satisfaction among all mortgage servicers the past six consecutive years, 2014 – 2019.

¹ Petition for Expedited Declaratory Ruling, Clarification, or Waiver of the American Bankers Association et al., CG Docket No. 02-278 (filed Mar. 30, 2020) (Petition).
COMMENTS

At Quicken Loans our first priority is the health and safety of our team members, clients, and communities we serve. While taking proactive measures to reduce the spread of the COVID-19 virus is everyone’s goal, we understand that this causes an economic disruption that may result in some of our clients having temporary financial difficulties.

Assistance is being offered during the COVID-19 crisis to those who have been impacted regardless of prior loan delinquency, and we are trying to provide as many communication lines possible, including a streamlined technology-based process to help those who need it without waiting on the phone. Even with these options, we will need to reach out to clients as communication is key for those who require assistance and allows us to provide the best service and help tailor realistic solutions that meet their needs.

The Joint Trades Petition requests that calls or texts placed customer-facing financial service providers using an automatic telephone dialing system or prerecorded or artificial voice on matters relating to the COVID-19 pandemic are calls made for “emergency purposes” under the TCPA. We support the petition as we have continued concerns about professional plaintiffs abusing the TCPA by suing businesses as a hobby, disturbing business and encouraging limited communication between companies and their clients.²

We ask the FCC to use its authority to honor the TCPA’s original intentions to protect the consumer and level the playing field for all mortgage servicing communications by exempting these during the pandemic. This would allow mortgage servicers to more effectively help clients stay in their homes. It also ensures services are better able to comply with the TCPA and other applicable laws.

IV. Conclusion

We thank the FCC for the opportunity to comment on the Joint Trades Petition on a TCPA exemption during COVID-19. Quicken Loans continues to closely monitor the spread and impact of the COVID-19 pandemic and we remain proactive in informing, educating, and guiding our clients, team members, partners, and regulators. Should you have additional questions please don’t hesitate to reach out to Nicole Booth at nicolebooth@rockcentraldetroit.com or 313-373-4950.

Sincerely,

William Emerson
Vice Chairman
Quicken Loans