



VIA ELECTRONIC FILING

May 24, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

Re: *Notice of Ex Parte Meeting Regarding Public Notice on Interpretation of the Telephone Consumer Protection Act in Light of the DC Circuit's ACA International Decision*

Dear Ms. Dortch:

On May 24, 2018, Joseph Habib, Associate Counsel, and Nicole Ehrbar, Vice President of Public Policy, from Quicken Loans Inc. ("Quicken Loans") met with Zenji Nakazawa, Legal Advisor with Federal Communications Commission (the "FCC" or "Commission") Chairman Pai's Office, to discuss the *Public Notice* seeking comment on the interpretation of the Telephone Consumer Protection Act ("TCPA") in light of the D.C. Circuit's ACA International decision.¹

Background

As background, Detroit-based Quicken Loans is the nation's largest home mortgage lender. The company closed more than \$400 billion of mortgage volume across all 50 states from 2013 through 2017. Quicken Loans moved its headquarters to downtown Detroit in 2010. Today, Quicken Loans and its Family of Companies employ more than 17,000 full-time team members in Detroit's urban core. The company generates loan production from web centers located in Detroit, Cleveland and Phoenix. Quicken Loans also operates a centralized loan processing facility in Detroit, as well as its San Diego-based One Reverse Mortgage unit. Quicken Loans ranked highest in the country for customer satisfaction for primary mortgage origination by J.D. Power for the past eight consecutive years, 2010 – 2017, and also ranked highest in the country for customer satisfaction among all mortgage servicers the past four consecutive years, 2014 – 2017.

Quicken Loans was once again named to FORTUNE magazine's "100 Best Companies to Work For" list in 2018 and has been included in the magazine's top 1/3rd of companies named to the list for the past 15 consecutive years. The company was also named the #1 place to work in technology in 2017 by Computerworld magazine's "100 Best Places to Work in IT," a recognition it has received 8 times in the past 12 years.

¹ *Public Notice Seeking Comment on Interpretation of the Telephone Consumer Protection Act in Light of the D.C. Circuit's ACA International Decision*, FCC 18-493, CG Docket No. 18-152 & 02-278, FCC (2018)

Public Notice Comments

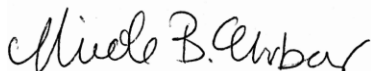
As discussed during the meeting, Quicken Loans (1) expressed the importance of a clear autodialer definition, which says dialing from a list does not institute an autodialer; (2) supported a safe harbor for a reassigned number database; and (3) discussed clear rules of the road, including designated snail mail, email, websites, and others, so consumers know how to opt-out of receiving calls.

Additional Discussion

Quicken Loans was also joined by Celia Winslow from the American Financial Services Association ("AFSA"); Faith Schwartz, on behalf of Mr. Cooper; and Robert Coker from Selene Finance LP. The group discussed the impact of the TCPA on financial services as a whole; provided an overview of the attached "TCPA Coalition Principles" document, which aligns with topics in the *Public Notice*; and offered the group as a financial services stakeholder resource as the FCC moves through the process. Specific attention was given to the competing regulatory requirements for the mortgage servicing industry as well as the crippling affect that the most recent interpretation of what constitutes an "autodialer" has had on our industry's ability to utilize compliance enhancing technology and to effectively communicate with existing customers with whom we have an established business relationship.

Conclusion

We thank the Commission for the opportunity to discuss these important issues and provide feedback. We look forward to a continued dialogue with the FCC as it examines how to stop bad actors and calls that harm the consumer and hurt business communications. Should you have any further questions, please contact me at nicoleehrbar@quickenloans.com or 313-373-4950.



Nicole Ehrbar
Vice President of Public Policy
Quicken Loans

cc: Zenji Nakazawa