

May 29, 2019

Federal Communications Commission
Commission's Secretary, Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: Draft Declaratory Ruling

Dear Ladies and Gentlemen of the FCC,

I am writing on behalf of Coast Central Credit Union, which serves the communities of Humboldt, Del Norte and Trinity Counties in northern California. We have 70,000 members and \$1.5 billion in assets. Coast Central Credit Union respectfully submits the following comments to the Federal Communications Commission (FCC) on its draft Declaratory Ruling (Ruling) and Third Further Notice of Proposed Rulemaking (FNPRM) regarding "Advanced Methods to Target and Eliminate Unlawful Robocalls" (CG Docket No. 17-59, WC Docket No. 17-97). Our credit union has serious concerns regarding the impact the FCC's draft Ruling could have on our ability to communicate critical information to our member-owners.

We are concerned the FCC's draft Ruling conflicts with the encouragement the Consumer Financial Protection Bureau (CFPB), National Credit Union Administration (NCUA) and other financial regulators have given financial institutions to use modern communication methods to provide time-sensitive account information to members.

The draft Ruling will further erode our credit union's ability to relay time sensitive information on and implement consumer protections regarding fraud, privacy, and account activity.

As a result, the draft Ruling could not only potentially endanger consumers' financial well-being, but also safe and sound credit union practices.

While we support efforts to reduce illegal robocalls, we have significant concerns that the action the FCC intends to take is overly broad and could have a significant adverse impact on the ability of credit unions and other financial service providers to communicate with their members and customers.

Further, neither the credit union nor credit union members will know when calls are blocked. As a result, credit union members may face costly charges in the form of general liability for fraud charges ranging from \$0 to \$500 for debit account fraud identified within the first 60 days to the full amount of any fraud identified thereafter; \$50 for each instance of credit-card fraud; and account overdraft fees or over-the-limit fees based on their credit limits.

The FCC should do more to distinguish between illegal callers and calls from legitimate businesses with pre-existing relationships.

Today, consumers can opt-in to call blocking services. The FCC intends to reverse this practice and allow consumers to opt-out. Part of the justification for the Ruling is consumers were not aware of their right to opt-in and so few did; however, if consumers did not have enough information to know their right to opt-in, it is unlikely they will have enough information to know their right to opt-out.

We are concerned that consumers will have insufficient information regarding the consequences of blocking all calls except those on their personal white list or contacts list. For example, members who applied for loans and need to be called by loan officers may not have those loan officers' numbers stored in their phones. This would effectively block credit union calls from reaching members that have opted-in. It could also complicate credit unions' collection efforts, which could delay borrowers getting critical information and subjecting them to adverse credit reporting.

The FCC's Ruling would become effective upon adoption. Given these significant concerns, we strongly urge the FCC take more time to consider stakeholder comments and potential unintended consequences.

We like receiving the following messages from our members like this one where "She said she used her card a lot today, and when she go home, there was a message from CCCU making sure all the purchases were indeed hers. Her parting words were "you guys rock!" These type of security messages to help our members avoid losses would be restricted.

Thank you for the opportunity to comment on the draft Ruling and for considering our views.

Sincerely,

James Sessa
President/CEO
Coast Central CU

cc: CCUL