

May 28, 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 the members and Board of Directors of Safe 1 Credit Union. Our Credit Union serves 68,000 members residing primarily in Central California. I am writing to comment on the Federal Communications Commission (FCC) draft Declaratory Ruling () and Third Further Notice of Proposed Rule making (FNPRM) regarding "Advanced Methods to Target and Eliminate Unlawful Robocalls" (CG Docket No. 17-59, WC Docket No. 17-97).

Our Board of Directors and Management have significant concerns regarding the impact that this draft Ruling would have on our ability to contact and communicate with our 68,000 member owners for important issues including fraud alerts, account notices, delinquent status, and other vital account information. We firmly believe that this draft Ruling will limit our ability to provide necessary consumer protections regarding privacy, fraud, and account activity.

We agree that illegal robocalls need to be addressed. However, the draft Ruling, if enacted, would eliminate calls and text to our members containing absolutely critical time sensitive information from the credit union. Our credit union supports the efforts of the FCC to reduce illegal robocalls, but the subject Ruling, as currently drafted, would create collateral damage that may actually more harmful to our consumer/members than the illegal robocalls.

It is our view that the FCC should structure any such Ruling to limit true illegal robocalls while retaining the ability of credit unions and other legitimate businesses to continue to conduct necessary business with customer/members who they have a pre-existing and ongoing relationship with. We believe any such Ruling should only apply when the consumer is not an established customer of the business initiating the call. Calls or other communications for legitimate business purposes to an existing customer should be excluded from any such Rule.

We are concerned with the impact of the consumer's ability to block all calls except those from numbers on their personal white list or contacts list. We regularly contact members who applied for loans and need to be called by loan officers or collections and accounting staff members regarding loan payments or suspicious account activity that would not be included in their contacts list. The draft Ruling could result in significant delays in borrowers getting vital information and even subject them to additional fees or adverse credit reporting.

In summary, we encourage the FCC to address these concerns before adopting the draft Ruling. The unintended consequences of such a ruling may result in harm to the consumer, which is the opposite of the FCC's intentions.

We hope you will consider our concerns and thank you for the opportunity to comment on this draft Ruling.

Sincerely,

Doug Kileen  
CEO  
Safe 1 CU

cc: CCUL