



Filed via ECFS

May 29, 2019

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

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls CG Docket No. 17-59 and Call Authentication Trust Anchor WC Docket No. 17-97

Dear Ms. Dortch:

The Illinois Credit Union League (ICUL) is the primary trade association for over 250 state and federally chartered credit unions throughout the State of Illinois, who in turn serve over 3 million consumers. We appreciate the opportunity to comment on the Federal Communications Commission (FCC) proposed declaratory ruling to allow voice service providers to block robocalls by default, unless a consumer opts out.

While ICUL applauds FCC's efforts to combat illegal robocalls, we have significant concerns that the action the FCC intends to take is overly broad and could have a substantial adverse impact on a credit union's ability to communicate with their members. Our concerns are further compounded by the fact the FCC's order will become effective upon adoption in less than three weeks, a very limited time to consider stakeholders concerns.

Credit Union members own their credit union. Therefore, they need and expect to receive calls and texts from their credit union. These communications contain critical information, including fraud and account alerts. We are, therefore, very concerned that the FCC's proposed actions will erode credit unions' ability to relay information on and implement consumer protections regarding fraud, privacy and account activity. As a result, the proposed declaratory ruling could not only potentially endanger consumers' financial well-being, but also safe and sound credit union practices.



In addition to creating new barriers between credit unions and members, the ruling also runs contrary to encouragement by the National Credit Union Administration, Consumer Financial Protection Bureau and other financial regulators to use modern communication methods to provide time-sensitive account information to members.

We are also concerned that the draft ruling would take the choice to receive a call out of consumers' hands and put it in the hands of the voice provider, which carries a myriad of socio-economic implications including credit union members not even being aware that they have blocked calls from their credit union.

Given the impact the ruling will have on credit unions and their ability to communicate with their members, we urge the FCC to delay and reconsider the ruling.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Joni Senkpeil".

Illinois Credit Union League

By: Joni Senkpeil, SVP Member Solutions