



May 30, 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; Call Authentication Trust Anchor, WC Docket No. 17-97

Dear Ms. Dortch:

On behalf of the Pennsylvania Credit Union Association, I am writing to voice concern of the Federal Communications Commission's (FCC) consideration of a declaratory ruling that allows voice service providers to default block robocalls and requires consumers to opt in to receive such communications. The Pennsylvania Credit Union Association is a state-wide advocacy organization that represents a majority of the approximately 380 credit unions and 4.1 million credit union members in the Commonwealth of Pennsylvania.

Credit unions are not-for-profit financial cooperatives owned by their credit union members. Credit unions exist to serve the financial needs of their members by creating a sense of loyalty, providing better rates and lower fees, investing in financial education, and working with their members when unforeseen and unexpected financial problems arise. The personal relationship credit unions create with their members is evident in their communications with their members. Credit union members are often notified via a phone call or a text message from a trusted credit union representative when there is critical information to convey about an account compromise, a fraud alert, or information to help a member avoid a fee.

While we support the FCC's efforts to combat illegal robocalls and create a reassigned numbers database, we believe this proposed action could seriously disrupt vital credit union member communications. The declaratory ruling, if passed on June 6, will impede a credit union's ability to relay privacy, account activity and fraud information and implement additional consumer protections, which would potentially endanger the financial well-being of a credit union member and inhibit safe and sound credit union practices. We also are concerned that consumers would not be aware what communications from their credit union have been blocked by their voice service provider. Not having enough information to know their right to opt-in will result in members incurring overdraft fees, fraud charges, and other fees that are avoided when credit unions can communicate vital information to their members.

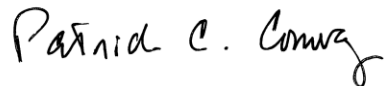
In addition, we find the FCC's ruling to counter the Consumer Financial Protection Bureau, the National Credit Union Administration, and other financial regulators' guidance on how credit

unions can utilize modern communication methods to provide time-sensitive account information to their members. The inconsistency between the FCC's ruling and existing federal regulations will put Pennsylvania credit unions at risk for potential litigation – forcing them to comply with one and resulting in noncompliance with another.

Although well intentioned, we believe this ruling is over-reaching in that it will limit a credit union's ability to effectively communicate time sensitive information with their members. We encourage the FCC to take more time to consider stakeholder concerns before propagating such a rule.

Thank you for your attention on this matter. Please feel free to contact me at your convenience with any questions.

With best regards,

A handwritten signature in black ink that reads "Patrick C. Conway". The signature is written in a cursive, flowing style.

Patrick C. Conway
President & CEO

PCC:llb