

May 29, 2019

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Comments on CG Docket No 17-59 and WC Docket No. 17-97

Dear Sir or Madam:

I am writing on behalf of SchoolsFirst Federal Credit Union (SchoolsFirst FCU), which serves school employees and their family members in California. SchoolsFirst FCU has almost 900,000 Members and more than \$15 billion in assets. We appreciate the opportunity to comment on the Federal Communications Commission's (FCC) Notice of Proposed Rulemaking on Advanced Methods to Target and Eliminate Unlawful Robocalls.

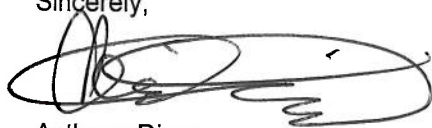
While we understand the intent behind the FCC's proposed ruling and fully support efforts to reduce illegal robocalls, SchoolsFirst FCU believes that the FCC's proposed ruling is overly broad and conflicts with the encouragement the Consumer Financial Protection Bureau, National Credit Union Administration, and other financial regulators have given financial institutions to use modern communication methods in order to provide time-sensitive account information to members. The ruling would further 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.

Credit unions are not-for-profit financial cooperatives owned by their Members, who need and expect to receive critical information by call and text in certain circumstances. If Members have not added their credit union to their "white list" or "contact list," they may not receive calls from loan officers about loans they have applied for or from credit union employees about potential fraudulent activity on their accounts. In some instances, this could also prevent borrowers from receiving important information about past due credit accounts, resulting in adverse credit reporting. In short, the current call-blocking proposal could result in credit unions being unable to reach their Members in the most efficient manner possible with time sensitive notifications.

SchoolsFirst FCU is also concerned that this proposal could lead to calls about financial and consumer health being blocked with neither the consumer nor the credit union realizing it. We believe 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.

Thank you for the opportunity to comment on this proposed rulemaking. SchoolsFirst FCU supports efforts reduce illegal robocalls, but we are concerned that overly broad action would have a significant adverse impact on credit union's ability to communicate with their Members.

Sincerely,



Anthony Diaz
Vice President, Compliance
SchoolsFirst Federal Credit Union

Cc: Credit Union National Association (CUNA)
California/Nevada Credit Union League (CCUL)