



May 30, 2019

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

Re: CG Docket No. 17-59 and No. 17-97

Dear Ms. Dortch:

The Indiana Credit Union League (ICUL) appreciates the opportunity to comment on the Federal Communications Commission's (FCC) Declaratory Ruling concerning methods to eliminate unlawful robocalls. The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.5 million consumers. While we support efforts to eliminate unlawful robocalls, we have serious concerns about the proposals being considered in this Declaratory Ruling and strongly urge the FCC to take more time to consider its impact on lawful, necessary calls made by legitimate businesses with pre-existing relationships with consumers. In a credit union's case these are calls made to our member-owners.

Credit unions need to communicate with their members and members need to hear from their credit unions. Important calls are made daily to credit union members to provide time-sensitive account information and protect members against fraud and other unwanted account activity. The proposals under FCC consideration give broad authority for voice services providers to block calls they consider to be unwanted, but that potentially could be vital to protecting a consumer's financial well-being. Further, providing consumers with the ability to block calls from anyone not on the consumers' contact list could prevent consumers from receiving the services they have asked for or important fraud notices. We are very concerned that consumers, understandably looking for relief from unlawful robocalls, might have insufficient information regarding the consequences of blocking all outside calls. 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. It also could lead to a member's credit card being turned off because fraud prevention calls cannot get through. Blocking lawful calls from reaching consumers can have negative consequences to those consumers.

We recognize that consumers are swamped in unlawful calls from bad actors. However, we are very concerned that the action the FCC intends to take is overly broad and could have a significant adverse impact on credit unions' ability to communicate with their members. We believe that the FCC should take more time to distinguish between illegal callers and lawful, legitimate calls between credit unions and their member-owners. Please take time to consider these concerns and hold off from adopting the Declaratory Ruling and your June 6 meeting. If you have any questions regarding our comment letter, please contact me at (317) 594-5320. Thank you again for the opportunity to comment.

Sincerely,

John McKenzie
President
Indiana Credit Union League