



June 1, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Dear Ms. Dortch:

Re: *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*
(CG Docket No. 17-59)

Alaska USA Federal Credit Union (Alaska USA) appreciates the opportunity to comment on the FCC's proposed rule regarding a possible reassigned number database. Alaska USA is a federally chartered credit union with \$7.2 billion in assets, serving over 640,000 members throughout the United States. We appreciate the FCC's direction in this area, as the credit union's ability to communicate effectively with our members has been harmed by the draconian liability associated with the TCPA and the lack of centralized information for reassigned numbers. Alaska USA supports the proposed change, consistent with the comments below.

Single FCC Database: The effectiveness of a database will rely on service providers consistently contributing to the same database. Utilizing one or more commercial data aggregators may cause unnecessary inflation of the expense related to the use of the database(s) and cost will be a major factor in end user adoption. It could also serve to fractionalize the information being reported and reduce the usefulness of any one solution. For these reasons, the credit union supports a single FCC-controlled database with mandatory reporting by all service providers.

Database Characteristics: The proposed database should contain all disconnected numbers from the date the database is established and made accessible to the general public. While retroactive inclusion of pre-established disconnected numbers would be extremely helpful, we are concerned that the burden this will place on carriers will unduly delay the database's introduction. In addition, as a guiding principle, Alaska USA advocates for the minimal public disclosure of member information in all forms and forums in order to minimize the risk of fraud or the commercial misuse of information. For that reason, the credit union believes the only information that should be submitted and contained within the database is the number that has been disconnected, the date of disconnection, and whether the number is a residential or mobile number. The proposed rule requested feedback on the length of time in which disconnect information should be retained within the database. We agree with the opinion expressed by the National Association of Federally-Insured Credit Unions that the FCC should limit the reported reassigned numbers information to ten years.

Reporting Requirements: In order to minimize the impact to providers, the mandatory reporting requirements for service providers should be established at no more than quarterly, and all service providers should be required to report their permanent disconnects. Temporary disconnects for reasons like non-payment (but which can still be remedied by the consumer) should not be included in the data. Quarterly reporting should facilitate the timely removal of reassigned numbers by end users and minimize the cost and expense to both service providers and end users. We also urge the FCC to clarify that only service providers are required and expected to report to the database.

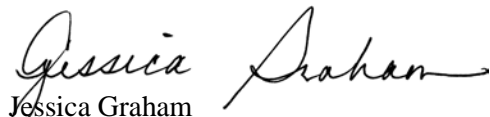
Aging Period: The FCC should adopt a minimum aging period for disconnected numbers before these numbers can be reassigned by the provider. The minimum aging period of 90 or 120 days should provide sufficient opportunity for the reassignment to be reported to and retrieved from the database.

Feasible Use and Structure of Information; Certification: Alaska USA anticipates that it would periodically download information from the database to be incorporated into our main systems, likely on a monthly or quarterly basis. Ideally, the information would be available in a Line Delimited TXT file. Ideally, log-on credentials could be provided to an institution as well as individual users. The database should be available on a 24/7/365 basis as different organizations and users will have different needs and windows of time in which to access it. We agree with the proposal to require users of the database to certify that the information they seek to access will only be used for TCPA compliance purposes.

Safe Harbor: Alaska USA strongly supports the establishment of a safe harbor for users of the database. The FCC should consider structuring the safe harbor in a manner similar to that used by the Department of Defense for Military Lending Act compliance. In that case, an institution that relies upon the Military Lending Act database established by the Department of Defense to verify borrower status and comply with recordkeeping requirements is deemed to have made a conclusive determination with respect to the transaction or account, provided it retains adequate record of the information contained from those sources. The parallel for the FCC database would be an absolute defense to a TCPA claim related to the disconnected number, provided the entity can show a written policy and established practice of using the database.

Thank you for the opportunity to comment on this proposal. Please feel free to contact me at (907) 646-6614 if you have any question.

Sincerely,

A handwritten signature in black ink, reading "Jessica Graham". The signature is fluid and cursive, with the first name "Jessica" and last name "Graham" clearly distinguishable.

Jessica Graham
Senior Vice President, General Counsel