

May 31, 2018

Federal Communications Commission
Commission's Secretary, Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: Comments on Advanced Methods to Target and Eliminate Unlawful Robocalls; CG Docket No. 17-59

Dear Ladies and Gentlemen of the FCC,

I am writing on behalf of Travis Credit Union, which serves a 12 county field of membership in Northern California. We have 180,000 members and \$3 billion in assets. Travis Credit Union appreciates the opportunity to provide comments to the Federal Communications Commission (FCC) on its proposed rules to ensure that one or more databases are available to provide callers with the comprehensive and timely information they need to discover potential number reassignments before making a call.

Please consider the following points:

- The Commission should require that all service providers, whether it be voice or text messaging providers, report reassigned numbers to a single database. Travis Credit Union would prefer a single database so we do not have to search multiple databases for this information. The reporting of this information from data aggregators should be mandatory to ensure we are accessing all reassignments from all aggregators.
- Regarding information available in the database, Travis Credit Union would like to see the date the telephone number was disconnected, the date the telephone number was reassigned and the name of the party it was reassigned to in order to ensure the current owner is not our member.
- The Commission should define a number being reassigned when it is truly reassigned to another party.
- It would be beneficial if the database holding the reassigned information was updated in real time or as close to real time as possible to ensure the reassignment information we are accessing is up to date.
- At this time Travis Credit Union believes there is no reason to limit the reporting of reassigned numbers.
- The Commission should provide alternative formats for reporting. There should be multiple options provided in order to export the data that is provided in the database. The preferable option would be to allow users to export the report to a spreadsheet application.
- A safe harbor from Telephone Consumer Protection Act (TCPA) liability should be provided when a credit union uses a reassigned numbers database. Credit unions checking a reassigned numbers database monthly should receive protection under a safe harbor.

Travis Credit Union supports the FCC's proposal to provide a reassigned telephone numbers database to avoid calls to reassigned telephones. Thank you for the opportunity to comment on this Proposed Rule and for considering our views on the availability and content of a reassigned numbers database.

Sincerely,

Mark Vinella
Vice President, Compliance & Risk Management
Travis CU

cc: CCUL