

June 7, 2019

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

Re: Notice of *Ex Parte* Presentation, CG Docket No. 02-278

Dear Ms. Dortch:

This *Ex Parte* Notice relates to two phone meetings today, and two emails sent earlier this week between myself and Michael Scurato, counsel to Commissioner Starks, and myself and Travis Litman, counsel to Commissioner Rosenworcel.

In the emails, I forwarded to both Mr. Scurato and Mr. Litman the primary comments,<sup>1</sup> and the reply comments,<sup>2</sup> we submitted to the FCC opposing the Petition filed by NorthStar Alarm Services, LLC. These comments were submitted on behalf of NCLC's low-income clients, and Consumer Reports, Consumer Action, Consumer Federation of America, Electronic Privacy Information Center, National Association of Consumer Advocates, and Public Knowledge.

During the meetings today, we discussed the requests made in NorthStar's petition and the reasons why the petition should be denied. We also discussed other pending petitions by P2P, Visulus and Bebe. I explained that granting petitions for exemptions or retroactive waivers will only encourage callers to continue their attempts to evade the explicit consumer protections in the Telephone Consumer Protection Act (TCPA). We talked about the need to strictly interpret the definition of automated telephone dialing system so that all systems that dial automatically from a stored list are fully and clearly covered by the TCPA. Permitting the requested evasions will simply encourage more unwanted automated calls and texts to consumers, which would fly in the face of the express purpose of the TCPA to limit automated calls and texts to those which are expressly consented to, or relate to an emergency.

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<sup>1</sup><https://ecfsapi.fcc.gov/file/10316106937526/4%20Comments%20on%20NorthStar%20Alarm%20Services%20.pdf>

<sup>2</sup> <https://ecfsapi.fcc.gov/file/1032638201688/Soundboard%20Reply%20Comments%20March%202019.pdf>

This disclosure is made pursuant to 47 C.F.R. § 1.1206.

Thank you very much.

Sincerely,

/s/

Margot Saunders  
Senior Counsel