June 6, 2018

Ms. Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

Re: *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*

(CG Docket No. 17-59)

Dear Ms. Dortch:

Coastal Credit Union appreciates the opportunity to provide comments on ways to reduce or eliminate the number of unwanted calls to numbers that have been reassigned. Coastal is headquartered in Raleigh, NC with 2.9 billion in assets, serving 21 physical branches and more than 246,000 members.

In response to the Commission’s request for additional recommendations these are our comments for some of the specific questions posed:

1. Type of information needed by Callers:
   1. As a caller we have the name, address, phone number, and the date the phone number was provided by the account holders. We agree that at a minimum the database should be able to respond with a “yes’ or “no” when the name and phone number do not match, but it would be more beneficial if the caller was provided the name of the individual currently associated with the number and date the number was reassigned. Having this information would allow us to determine if the number still belongs to an account holder on the same account.
   2. The database should also indicate when a number currently isn’t assigned to an individual. This would allow callers to take preemptive steps to discontinue or suspend calls to the disconnected number prior to reassignment.
   3. It would be ideal for the database to exclude numbers that are temporarily disconnected or suspended due to non-payment so callers can continue to maintain the numbers as being valid.
2. Comprehensiveness of Database Information:
   1. Callers will need data from all types of voice service providers to make this a comprehensive reassigned numbers database. Without including all types of voice service providers, we as an organization may be missing a large subset of reassigned numbers.
   2. Due to the vast amount of data that could result from requesting past data, the database should only contain reassign and disconnected numbers from inception. Deciphering said data could potentially be complex if there are multiple reassignments for the same number. However, if data only includes information from inception, the safe harbor should include calls made to numbers reassigned prior to inception of the database.
3. Timeliness of Database Information:
   1. With the need to identify reassigned and disconnected numbers daily it makes sense to update the database daily. There are numbers being reassigned everyday regardless of how long the provider aged the number.
4. User Access to Database:
   1. We strongly believe there should be criteria in place prior to accessing the database to prevent the misuse of data. This could be accomplished by requiring a registration and approval process for all new users. During the registration process the user should select the reason for accessing the system, including TCPA compliance.
5. Database Use and TCPA Compliance:
   1. Adopting a safe harbor from TCPA violations would encourage callers to utilize the database to identify reassigned numbers. Callers should be able to avail themselves of the safe harbor protection from good-faith reassigned number calls and when the database information was inaccurate or did not contain the most up to date information.

In closing, we’d like to thank the FCC for allowing us to provide comments on the proposed database that would provide callers with the information needed to avoid placing calls to reassigned numbers and then facing potential TCPA liabilities.

Sincerely,

Jamie Saunders

Assistant Vice President, Collections/Loss Mitigation