



VIA ELECTRONIC FILING

June 10, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

RE: Notice of Ex Parte Meeting Regarding the Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991 (CG Docket No. 02-278) and Advanced Methods to Target and Eliminate Unlawful Robocalls Third Further Notice of Proposed Rulemaking (CG Docket No. 17-59, WC Docket No. 17-97)

Dear Ms. Dortch:

On June 6, 2019, President and CEO Victor You, General Counsel Jack Carver and Executive Business Consultant Jaclyn Millard from Rock Connections; Senior Principal Elise Pickering from Mehlman Castagnetti Rosen & Thomas; and Senior Counsel Gary Weingarden and Vice President of Public Policy Nicole Booth Ehrbar from Quicken Loans, Inc. ("Quicken Loans") met with the Honorable Ajit Pai, Chairman, and Zenji Nakazawa, Public Safety and Consumer Protection Advisor, of the Federal Communications Commission (the "FCC" or "Commission") to discuss the Telephone Consumer Protection Act ("TCPA") and the Notice of Proposed Rulemaking on unlawful robocalls as it relates to the mortgage industry.

ABOUT QUICKEN LOANS

As background, Detroit-based Quicken Loans Inc. is the nation's largest home mortgage lender. The company closed nearly half a trillion dollars in mortgage volume across all 50 states from 2013 through 2018. Quicken Loans moved its headquarters to downtown Detroit in 2010, and today, Quicken Loans and the Rock Family of Companies employ more than 17,000 full-time team members in Detroit's urban core. The company generates loan production from web centers located in Detroit, Cleveland and Phoenix, and also operates a centralized loan processing facility in Detroit, as well as its San Diego-based One Reverse Mortgage unit. Quicken Loans ranked highest in the country for customer satisfaction for primary mortgage origination by J.D. Power for the past nine consecutive years, 2010 – 2018, and also ranked highest in the country for customer satisfaction among all mortgage servicers the past five consecutive years, 2014 – 2018, making it the winningest mortgage lender in J.D. Power Award history.

Quicken Loans was once again named to FORTUNE magazine's "100 Best Companies to Work For" list in 2018 and has been included in the magazine's top 1/3rd of companies named to the list for the past 16 consecutive years. The company was also named the #1 place to work in technology in 2018 by Computerworld magazine's "100 Best Places to Work in IT," a recognition it has received 9 times in the past 13 years.

Quicken Loans does not follow the traditional "brick and mortar" model. We've proudly built an internet mortgage lending process that is dedicated to the best client experience possible. Our clients' happiness is our #1 priority. Our successful, centralized business model relies heavily on our ability to transact business by telephone. Illegal calls burden our clients and have the potential to reduce the value of the service we provide.

PROTECTIONS AGAINST UNLAWFUL ROBOCALLS

With client care in mind, we applaud the Chairman's efforts to target bad actors generating unwanted and illegal calls that annoy, harass and sometimes, defraud consumers. Specifically, we welcome protections against "spoofed" robocalls, which use fraudulent caller identification information to disguise the caller's identity.

In addition, we also support differentiating between illegal and legitimate business calls. As reliance on technology grows, consumers favor convenience and communications in their preferred manner. It becomes increasingly more difficult to communicate with consumers on any other device other than a cell phone. We appreciate the FCC's intent to target bad actors vs. legitimate businesses existing relationships with consumers.

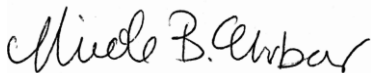
As the FCC moves forward, we ask for additional regulatory language to protect legitimate businesses outreach to consumers in two areas. First, the registered owner of a number should get early notice of blocking. In most cases, the true owner of the number will welcome blocking of spoofed calls that would otherwise be falsely attributed to them. It is unlikely that the technology will be error free, though, and without notice, there is no way a business can know calls are being blocked. This will also help alert businesses whose number suffers from administrative issues (a lapsed certificate, for example) which require correction. Second, businesses may still be injured by carriers that wrongly block their calls. An administrative process that lets businesses challenge blocking decisions strikes the balance between unfair liability and unfair blocking decisions.

INQUIRING ABOUT THE TCPA

We understand that consumers' privacy is paramount, and we ask the FCC to use its authority to honor the TCPA's original intentions to protect the consumer. With this in mind, we urge the FCC to move forward on releasing regulations creating a clear definition of an autodialer and clear rules of the road, including designated snail mail, email, websites, and others, so consumers know how to opt-out of receiving calls. This would allow mortgage lenders to effectively help clients stay in their homes and keep their credit intact. It also ensures mortgage lenders are better able to comply with the TCPA and applicable mortgage regulations.

CONCLUSION

We thank the Commission for meeting with us to discuss these issues, and as mentioned in the meeting, would like to extend an invitation to the Chairman and Mr. Nakazawa to again visit our offices in Detroit. Pursuant to Section 1.1206(b) of the Commission's rules, Quicken Loans is filing this notice electronically in the above-referenced docket. We look forward to a continued dialogue with the FCC as it examines how to how to stop bad actors and calls that harm the consumer and hurt business communications. Should you have any further questions, please contact me at nicolebooth@quickenloans.com or 313-373-4950.



Nicole Booth Ehrbar
Vice President of Public Policy
Quicken Loans

cc: Zenji Nakazawa