



May 30, 2019

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: Comments on CG Docket No 17-59 and WC Docket No. 17-97**

Dear Sir or Madam:

I am writing on behalf of Schools Financial Credit Union (Schools Financial CU), based in Sacramento, CA, which serves approximately 156,000 members and has over \$2 billion in assets. Thank you for the opportunity to comment on the Federal Communications Commission's (FCC) Notice of Proposed Rulemaking on Advanced Methods to Target and Eliminate Unlawful Robocalls.

While we understand the intent behind the FCC's proposed ruling and fully support efforts to reduce illegal robocalls, Schools Financial CU believes that the FCC's proposed ruling is overly broad and conflicts with the encouragement the Consumer Financial Protection Bureau, National Credit Union Administration, and other financial regulators have given financial institutions to use modern communication methods in order to provide time-sensitive account information to members. The ruling would further erode the ability of credit unions to relay information on and implement consumer protections regarding fraud, privacy, and account activity. As a result, the proposed declaratory ruling could not only potentially endanger consumers' financial well-being, but also impact safe and sound credit union practices.

Credit unions are not-for-profit financial cooperatives owned by their members, who need and expect to receive critical information via call and text in certain circumstances. If members have not added their credit unions to their "white lists" or "contact lists," they may not receive calls from loan officers about loans they have applied for or from credit union employees about potential fraudulent activity on their accounts. In some instances, this could also prevent borrowers from receiving important information about past due credit accounts, resulting in adverse credit reporting. In short, the current call-blocking proposal could result in credit unions being unable to reach their members in the most efficient manner possible with time sensitive notifications.

Schools Financial CU is also concerned that this proposal could lead to calls about financial and consumer health being blocked with neither the consumer nor the credit union realizing it. We believe that consumers will have insufficient information regarding the consequences of blocking all calls except those on their personal "white lists" or "contacts lists." For example, members who apply for loans and need to be called by loan officers may not have those loan officers' numbers stored in their phones. This would effectively block credit union calls from reaching members that have opted-in.

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Thank you for the opportunity to comment on this proposed rulemaking. But while Schools Financial CU supports efforts reduce illegal robocalls, we are concerned that overly broad action would have a significant adverse impact on our credit union's ability to communicate with our members.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Marriott', with a stylized, cursive script.

Tim Marriott  
President/CEO  
Schools Financial Credit Union