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VIA ELECTRONIC FILING – (<http://www.fcc.gov/ecfs>)

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-B204
Washington, D.C. 20554

**Re: Consumer and Governmental Affairs Bureau Seeks Comment on Credit Union National Association Petition for Declaratory Ruling Under the Telephone Consumer Protection Act of 1991
GC Docket No. 02-287**

Dear Ms. Dortch:

On behalf of the companies of CUNA Mutual Group (CUNA Mutual), we are pleased to provide comments to the Federal Communications Commission (Commission) regarding the September 29, 2017, Petition for Declaratory Ruling (Petition) filed by Credit Union National Association (CUNA) regarding the Telephone Consumer Protection Act of 1991 (TCPA). We offer this letter of support for the Petition and its proposal that the Commission adopt an established business relationship exemption for credit union informational messages to mobile phones. Alternatively, we support the Commission's use of express authority to exempt credit union calls or texts that are without charge to the called party, as also proposed by the Petition.

CUNA Mutual is the nation's leading provider of financial products and services to credit unions and credit union members. We make available various insurance and investment products to credit unions and millions of credit union members across the United States. Among the insurance products we offer is a coverage to help credit unions, boards of directors, and staff combat risk and trends in litigation, including those arising out of TCPA class action lawsuits.

As part of the cooperative movement, we embrace the credit union philosophy of "people helping people" and understand the unique relationship credit unions share with their members who are also owners of the credit union. Naturally, this unique business relationship generates important communications between the credit union and its members about critical issues ranging from governance to fraudulent activity to other account information. Members welcome and expect these communications from their credit unions; therefore, credit unions have a vested interest, shared by credit union member-owners, to invest and engage in modern, efficient, and member-preferred methods of communication. The Declaratory Ruling sought by the Petition would clarify to credit unions that important, non-marketing communications sent by credit unions to their member-owners do not trigger liability under the TCPA.

As a partner in the credit union movement, we support the Petition's calls for clarification through the adoption of an established business relationship exemption for credit union informational messages to mobile phones, or alternatively an act by the Commission under existing authority to exempt credit union informational calls or texts made without charge to the called party.

We thank the Commission for the opportunity to provide these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sabrina Guenther Frigo".

Sabrina Guenther Frigo
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