

November 6, 2017

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Chairman Ajit Pai
Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: DA 17-798
CG Docket No. 02-278

Dear Chairman Pai:

I am writing on behalf of SchoolsFirst Federal Credit Union (SchoolsFirst FCU), which serves the education community in Southern California. We have more than 750,000 Members and over \$13 billion in assets. SchoolsFirst FCU appreciates the opportunity to comment on the petition for declaratory ruling filed by the Credit Union National Association (CUNA).

CUNA's petition requests that credit unions be exempt from the Telephone Consumer Protection Act's (TCPA) prior express consent requirement for informational calls and text messages to wireless numbers:

1. If the consumer has an established business relationship (EBR) with the credit union and;
2. If the calls and/or texts are not charged to the called party, in particular when the called party's wireless plan has unlimited minutes and texts.

SchoolsFirst FCU strongly supports CUNA's petition and urges the FCC to adopt the petition.

Credit unions are unique, not-for-profit financial cooperatives that are Member-owned. Member-owners expect a high level of service, which includes immediate communication on matters of importance. Our Members expect their Credit Union to notify them of fraudulent activity, account issues, and even reminders of overdue payments in a timely manner to protect them from financial harm. As consumers as a whole are rapidly abandoning their residential landlines for wireless or internet-based services, the current restriction has made contacting our Members on matters of importance increasingly difficult. Requiring credit unions to obtain prior express consent delays the high level of service our Members expect and deserve.

By granting an exemption to credit unions for EBRs, credit unions will be able to easily contact Members who use a wireless phone in place of a residential landline in a timely manner. Text messaging is an especially effective way of delivering immediate information and is increasingly the preferred channel for critical communication for many of our Members. The proposed exemption takes into account the changing ways credit union Members communicate and allow us to better serve the needs of our Membership.

We thank you for the opportunity to provide comments on the petition and we are hopeful that thoughtful consideration will be given to the operational and financial burden on credit unions, as well as the benefits our Members will receive as a result of granting the exemption.

Sincerely,



John J. Conine
Senior Vice President, Consumer Lending
SchoolsFirst Federal Credit Union

cc: Credit Union National Association (CUNA)
California & Nevada Credit Union Leagues (CCUL)