



November 6, 2017

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Federal Communication Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Mr. Pai:

Thank you for the opportunity to comment on Credit Union National Association ("CUNA") Petition for Declaratory Ruling under the Telephone Consumer Protection Act ("TCPA") of 1991, CG Docket No. 02-278. TTCU Federal Credit Union ("TTCU") has over 125,000 credit union members located throughout the Central Midwest. I write to express TTCU's support for CUNA's petition for regulatory relief to allow credit unions to communicate with their member-owners.

Credit unions are tax-exempt not for profit democratically operated financial cooperatives that have a unique relationship with their members. Credit union members are also owners of the credit union. This special relationship creates a variety of communications between the credit union and its member-owners, ranging from timely and critical financial information to messages regarding governance issues and financial education. Because of our special relationship, TTCU's members welcome and expect this information.

CUNA's petition proposes equalizing TCPA treatment of informational messages to landlines and cell phones.

CUNA's Petition proposes the Commission adopt an established business relationship exemption for credit union informational messages to cell phones. This makes sense for several reasons. Credit unions are different than the average business communicating with consumers. Further, members are owners of the credit union and have a vested interest in being informed about many aspects of the operations ranging from governance communications; fraudulent activity; and other account information such as overdue payments. The relationship between credit unions and members is more like a partnership, and it benefits both parties to be in timely communication with each other. Having more information, not less, is helpful to credit union members.

An alternative route available to the Commission is to utilize its express authority to exempt calls that are without charge to the called party. CUNA's Petition requests that the Commission exempt credit union informational calls or texts that are in fact free to the called party under the called party's wireless plan. Further, the majority of cell phone plans now include unlimited calling and texting. If members are not paying for these calls it is common sense that credit unions should be able to freely communicate with the member about information they want and need.



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Other Regulators Have Encouraged Credit Unions to Communicate with Consumers

Granting CUNA's petition would also align the Commission's policies with recent guidance from the Consumer Financial Protection Bureau (CFPB). The CFPB urged both banks and credit unions to text their consumers regarding financial information. Further the CFPB is urging credit unions to provide "real-time information" to consumers through text alerts to help protect their finances, while the TCPA and Commission rules subject credit unions to liability for automated calls and texts, it creates extremely problematic, conflicting guidance about how credit unions should be communicating with their members. Because of this paradox, credit unions are placed in the untenable position of having to choose between federal regulators.

Credit unions have been recognized by the CFPB for our outstanding financial education efforts. A severely outdated statute and unclear guidance should not impede this work. Accordingly, I request that the Commission adopt an established business relationship exemption for credit union informational messages to cell phones of member/owners; and exempt calls that are without charge to the called party.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Jones".

Stephanie Jones, Chief Risk Officer
TTCU Federal Credit Union