



December 8, 2014

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Office of the Secretary
Federal Communication Commission
445 12th Street SW
Room TW-A325
Washington DC. 20554

RE: CG Docket No. 02-278

Comments In Support of Petition for Exemption of The American Bankers Association

To whom it may concern,

Thank you for providing the Online Trust Alliance (OTA) the opportunity to submit comments in response to the American Bankers Association's (ABA), petition for exemption of the Telephone Consumer Protection Act (TCPA).

As a 501c3 non-profit organization, OTA's mission is to enhance online trust and while promoting innovation and the vitality of the Internet. OTA works to educate businesses, policy makers and stakeholders about best practices and tools that enhance the protection of users' security, privacy and identity. To this end we support ABA's request that financial institutions be permitted to send non-telemarketing messages to customers by the most efficient means available at no charge to those customers, subject to conditions that protect consumers' privacy.

As 2014 has redefined the vulnerability of our critical infrastructure and as the sophistication of cybercriminals, it is critical to recognize it is in the best interest of consumers to provide effective and efficient means to notify impacted parties. Such communications would facilitate real time notifications reaching impacted users who increasingly rely on mobile devices for their personal and business communications. For many demographics mobile devices are becoming the primary or sole communication device that they rely on.

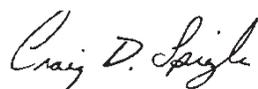
Such notices have the ability to help prevent and mitigate the impact of many threats. These range from bank account take overs and damages resulting from identity theft. As a member of the FCC's Communications Security, Reliability and Interoperability Council's (CSRIC), several of the recent working groups have reported that effective communications are critical to the mitigation of harm to consumers.

Further data has been conclusive that relying on email alone has proven to be ineffective at best. Often such email addresses on file are no longer used and are not checked often enough to effectively mitigate the threat. Text messages and automated calls, however, are more likely to reach impacted parties quickly as consumers are more likely to have their mobile devices with them, enabling them to take action to mitigate fraudulent activities related to their banking accounts and credit cards.

As such, OTA supports the petition for exemption of the Telephone Consumer Protection Act (TCPA) as requested by the ABA, limited to security and fraud prevention notification purposes and respectfully urges the Commission to grant the requested exemption. Doing so will facilitate prompt and efficient communication of time-sensitive information that can both limit the occurrence and impact of online crime and identity theft.

OTA looks forward to working with the Commission supporting these efforts and related best practices to enhance protection, detection, notification, remediation and recovery from online fraud and threats.¹

Sincerely,



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