



May 21, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Permitted Ex Parte Presentation - Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991 CG Docket No. 02-278

Dear Ms. Dortch,

On May 19, 2014, Balaji Rajan, president and CEO of Ceannate; Walter Pryor, vice president of government relations for Ceannate; and Lauren Maddox, principal, Podesta Group, met at the FCC with Amy Bender, legal advisor, Office of FCC Commissioner Michael O'Rielly.

The purpose of this meeting was to discuss the comments Ceannate filed in Docket No. 02-278 (attached) with the Coalition of Higher Education Assistance Organizations, National Association of College and University Business Officers, and the National Council of Higher Education Resources. Specially, Balaji Rajan and Walter Pryor emphasized how important it is for the commission to exercise its discretion and expeditiously (1) clarify that not all predictive dialers are categorically automatic telephone dialing systems; (2) confirm that "capacity" under the TCPA means present ability; (3) clarify that prior express consent attaches to the person incurring a debt and not the specific telephone number provided by the debtor at the time a debt was incurred; and (4) establish a safe harbor for autodialed "wrong number," non-telemarketing calls to wireless numbers.

During the meeting, Balaji Rajan and Walter Pryor also gave an overview of Ceannate's work in the default prevention space and the company's work with the Department of Education to assist students in avoiding delinquency or default on loan obligations as they enter student loan repayment. They explained how TCPA in its current form can hinder the company's work with students and prevent it from contacting students before they go into default.

Additionally, they discussed the attached report by Quantria Strategies, LLC entitled "Modifying the TCPA to Improve Services to Student Loan Borrowers and Enhance Performance of Federal Agency Loan Portfolios." The report analyzes the President's budget proposal calling for a modification to TCPA to allow the Federal government and its agents to use automatic dialing systems when contacting wireless phones in the collection of debt owed to or guaranteed by the United States.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Sage".

Elizabeth Sage, Director, Podesta Group

Cc: Amy Bender



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