



June 23, 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 June 19, 2014, Balaji Rajan, president and CEO of Ceannate and Lauren Maddox, principal, Podesta Group, met at the FCC with Nicholas Degani, legal advisor, Office of FCC Commissioner Pai.

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 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 also gave an overview of Ceannate's history, its work in the default prevention space and discussed 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. He 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, he 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: Nicholas Degani



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