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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Advanced Methods to Target and Eliminate) CG Docket No. 17-59
Unlawful Robocalls)
)
Call Authentication Trust Anchor) WC Docket No. 17-97
)

Comments of the Credit Union National Association

The Credit Union National Association (“CUNA”)¹ submits these brief opening comments in response to the Consumer and Governmental Affairs Bureau’s *Public Notice* seeking information on the deployment, use and effectiveness of call blocking efforts.² CUNA strongly supports the Federal Communications Commission’s efforts to curb illegal robocalls and, in particular, to address the use of unlawful spoofing that may facilitate fraudulent schemes. At the same time, CUNA, along with many others, has cautioned against the use of call blocking

¹ CUNA is the largest trade association in the United States serving America’s credit unions and the only national association representing the entire credit union movement. With a network of affiliated state credit union associations, CUNA represents nearly 5,500 federal and state credit unions that serve 155 million members collectively.

² Consumer and Governmental Affairs Bureau Seeks Input for Report on Call Blocking, CG Docket No. 17-59, WC Docket No. 17-97, Public Notice, DA 19-1312 (rel. December 20, 2019) (“*Public Notice*”).

technologies without the parallel ability of good-faith, legitimate callers to remove or correct the blocking or mislabeling of their legitimate, and often critical, calls.³

The information collected in response to the *Public Notice* is designed to assist the Commission in reporting on the implementation and effectiveness of call blocking measures as required by the Commission’s *Call Blocking Declaratory Ruling*.⁴ CUNA looks forward to reviewing the data provided by those engaged in call blocking efforts, especially with regard to metrics and methodologies used to assess the effectiveness in blocking calls and minimizing “false positives,” and, as directed in the *Public Notice*, the use of intercept messages and mechanisms to correct blocking of legitimate calls or mislabeling. As CUNA has previously noted, there is near universal support for implementation of effective challenge mechanisms to enable callers to unblock calls.⁵ To be effective, the challenge mechanism requires use of real time notifications of call blocking, readily ascertainable contact information to lodge concerns and trigger a review process, and a commitment to promptly resolving erroneous blocking.

The information collected in response to the *Public Notice* should also help inform the Commission’s implementation of the recently passed TRACED Act,⁶ which, among numerous other provisions, requires those providing robocall blocking services by default to implement

³ See, e.g., Letter from Mitria Wilson, Credit Union National Association, to Marlene H. Dortch, FCC, CG Docket No. 17-59, WC Docket No. 17-97 (filed May 30, 2019) (“*May 30th Ex Parte*”); Comments of Credit Union National Association, CG Docket No. 17-59, WC Docket No 17-97 (filed July 24, 2019) (“*July 24th Comments*”); Reply Comments of Credit Union National Association, CG Docket No. 17-59, WC Docket No 17-97 (filed Aug. 23, 2019).

⁴ *Public Notice* at n.4 (citing *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, WC Docket No. 17-97, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, 34 FCC Rcd 4876 (2019) (“*Call Blocking Declaratory Order*”)); *Call Blocking Declaratory Order*, 34 FCC Rcd 4876, 4906 at ¶87.

⁵ *May 30th Ex Parte*; *July 24th Comments* at 6.

⁶ Pallone-Thune TRACED Act, S. 151, 116th Cong. (2019).

transparent and effective redress options for callers at no additional charge.⁷ As adoption of call blocking and labelling programs increases, the very real possibility of blocking or mislabeling legal, and sometimes urgent, calls will become an increasingly urgent issue. Yet, as CUNA has previously explained, the Commission has no authority to authorize the blocking of legal calls.⁸ It is thus incumbent on the Commission to ensure that those engaged in blocking calls promptly, transparently, and effectively reverse the inadvertent blocking of legal calls.

Respectfully submitted,

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January 29, 2020

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⁷ S. 151, 116th Cong. §10(b) (2019) (adding new subsection (j) to 47 U.S.C. § 227 (2018)).

⁸ *July 24th Comments* at 10-12.