



July 24, 2019

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

Re: CG Docket No. 17-59 and WC Docket No. 17-97

Dear Ms. Dortch:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Federal Communications Commission (FCC) request for comment regarding proposed revisions to its rules implementing the Telephone Consumer Protection Act on issues pertaining to the implementation of SHAKEN/STIR.

We appreciate the FCC taking additional steps to protect consumers from illegal calls and ensure the effectiveness and integrity of the SHAKEN/STIR Caller ID authentication framework. With the implementation of this new framework, the FCC should direct voice service providers not to block "unsigned" calls under the SHAKEN/STIR framework until the framework has been fully implemented. Once the SHAKEN/STIR framework has been fully implemented, the FCC should permit voice service providers to block only calls that have not been properly authenticated under the framework or that have been authenticated, but the provider has concluded with a high degree of certainty that the call was placed illegally.

Also, the FCC should discourage voice service providers from labeling calls as "debt collector." Unlike the call labels of "spam" and "nuisance," which describe illegally placed calls, servicing and collections-related calls are lawful and beneficial to consumers. Also, the FCC should expand the categories of calls that should be included on the FCC's proposed "Critical Calls List" of numbers that may never be blocked. The list should include numbers from which the following categories of calls are initiated: fraud alerts, data breach notifications, remediation messages, utility outage notifications, product recall notices, prescription notices, and mortgage servicing calls required by Federal or State law.

In assessing the effectiveness of voice service providers' solutions to the problem of illegal automated calls, the FCC should measure and report annually on the number of calls that providers have blocked erroneously, including (but not limited to) the number of calls erroneously blocked under the SHAKEN/STIR framework.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Bradley D. Douglas". The signature is written in a cursive, flowing style.

Brad Douglas
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