

December 10, 2020

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Notice of *Ex Parte* Meeting, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59.

Dear Ms. Dortch:

On December 8, 2020, Jonathan Thessin of the American Bankers Association; Mark Brennan and Arpan Sura, Hogan Lovells, counsel for the American Association of Healthcare Administrative Management; Damon Smith, Credit Union National Association (“CUNA”) and Michael Pryor, Brownstein Hyatt Farber Schreck, counsel for CUNA; David Androphy, American Financial Services Association; Scott Buchanan, Student Loan Servicing Alliance; and Elizabeth LaBerge, National Association of Federally-Insured Credit Unions, met by telephone with Diane Holland, Legal Advisor for Media and Consumer Protection for Commissioner Geoffrey Starks.

Consistent with the Associations’ filings in the above-captioned proceeding, during this telephone conference, we urged the Federal Communications Commission to require voice service providers or their third-party analytics providers to provide immediate, real-time notification to callers when they block calls.¹ We further urged the Commission to adopt a 24-hour time frame within which the voice service provider must resolve claims of erroneous blocking or mislabeling. Finally, we asked the Commission to extend its redress requirements to voice service providers that, either directly or through third-party analytics providers with which they partner, erroneously attach adverse labels to legitimate calls. Compliance with these requirements should be a condition of any safe harbor provided by the Commission for any blocking or labeling of calls.

¹ Letter from Michael Pryor, Counsel for the Credit Union National Association, to Marlene Dortch, Secretary of the FCC, *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59 (filed Nov. 23, 2020); Comments of the American Bankers Association, *et al.* CG Docket No. 17-59 (filed Sept. 1, 2020); Reply Comments of the Credit Union National Association, *et al.*, CG Docket No. 17-59 (filed Sept. 29, 2020).

