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December 1, 2017

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

**RE: Support for request from the Federal Housing Finance Agency entered into
CG Docket No. 02-278.**

Dear Ms. Dortch:

The Housing Policy Council (HPC)¹ of the Financial Services Roundtable strongly supports the request from the Federal Housing Finance Agency (FHFA) that the Federal Communications Commission (FCC) issue a clarification that the requirements of the Telephone Consumer Protection Act (TCPA) do not apply to mortgage servicers attempting to provide assistance for homeowners affected by disasters.

The member companies of the Housing Policy Council include many of the major national mortgage servicers that are working to assist customers affected by the recent spate of natural disasters. These servicers have devoted considerable time and energy to reach each and every customer living in the affected areas - to assess their situations, provide critical information on how to access insurance and FEMA assistance, and to offer immediate forbearance to relieve them of the need to make their mortgage payments during the period of disruption.

Contacting the thousands of families whose lives are in disarray as they seek temporary shelter or relocate to live with friends or family while their homes are repaired is not an easy task. Displaced households are not answering calls made to their land-line telephones, nor collecting their mail on a daily basis. Therefore, we share FHFA's view that the statutory exception to TCPA's prohibitions exists for emergency communications, and we support the agency's request for FCC to clarify that this exception extends to mortgage servicers attempting to contact homeowners to provide assistance after a natural disaster.

¹ The Housing Policy Council (HPC) is a division of the Financial Services Roundtable (FSR). Our members are 31 of the leading national mortgage lenders, servicers, mortgage insurers, and title and data companies. HPC advocates for the mortgage and housing marketplace interests of its members in legislative, regulatory, and judicial forums. For additional information, visit: <http://www.fsroundtable.org/category/hpc/>.



HPC's mortgage servicing member companies have been actively engaging individually and in cooperative efforts through the HOPE NOW Alliance and relationships with non-profit counseling agencies to contact affected and often at-risk homeowners. The importance of access to the full range of telephone communications options especially mobile phones is critical to reaching these borrowers after a disaster occurs.

While invitations to in-person assistance events advertised through paid and earned-media can reach some homeowners and dedicated manual calling efforts can reach additional homeowners, there is a need to utilize calls made with automatic dialing, automated voice messaging, and text messaging to mobile phones to reach the maximum number of homeowners who may need assistance. Critical information about available assistance should be conveyed to homeowners as quickly as possible, and that necessitates the use of automated dialer technology. FHFA correctly points out that the emergency exception to TCPA requirements should be applied in these cases.

We recognize and support the intent of TCPA to protect consumers from unnecessary and repetitive calls from commercial sources. However, TCPA was not intended to prevent critical and necessary communications between mortgage servicers and customers in distress, to notify them of mortgage assistance options that are available to them in emergency situations.

The Housing Policy Council urges the FCC to fulfill the FHFA's request to clarify that the assistance calls described above are consistent with the emergency exception in the TCPA.

Thank you for considering our views. If you have any questions, please contact Paul Leonard at paul.leonard@fsroundtable.org or 202-589-1921.

Yours truly,

Edward J. DeMarco
President
Housing Policy Council
Financial Services Roundtable