



June 21, 2016

CG Docket No. 02-278

Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991
Reply Comments

To whom it may concern:

With regard to the proposed FCC rules on collection calls made to cell phones, NASFAA in general supports the comments submitted by the American Association of Community Colleges (AACC), the United Negro College Fund (UNCF), and the National Council of Higher Education Resources (NCHER).

The essential observation by these knowledgeable associations that avoidance of delinquency and default among student loan borrowers is not only paramount, but possible with proper and timely counseling given the payment plans and options available, seems to us a key factor when assessing the effects, both intended and unintended, of these proposed rules.

We also agree that collection activities must be given a broad interpretation to facilitate timely and effective use of the many repayment benefits uniquely available to borrowers of federal student loans. The desire to provide generous terms for loans that make higher education possible for so many Americans has unfortunately resulted in a confusing array of options. In fact, the most beneficial of these terms are often the most underutilized. Proactive counseling throughout the life of the loan requires different approaches and content at different times. We also find that the comments arguing for a separate set of rules for federal education loans are compelling. Separate rules afford better targeting of unique problems.

Thank you for this opportunity to comment.

Sincerely,

Justin Draeger
President and CEO
NASFAA