BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

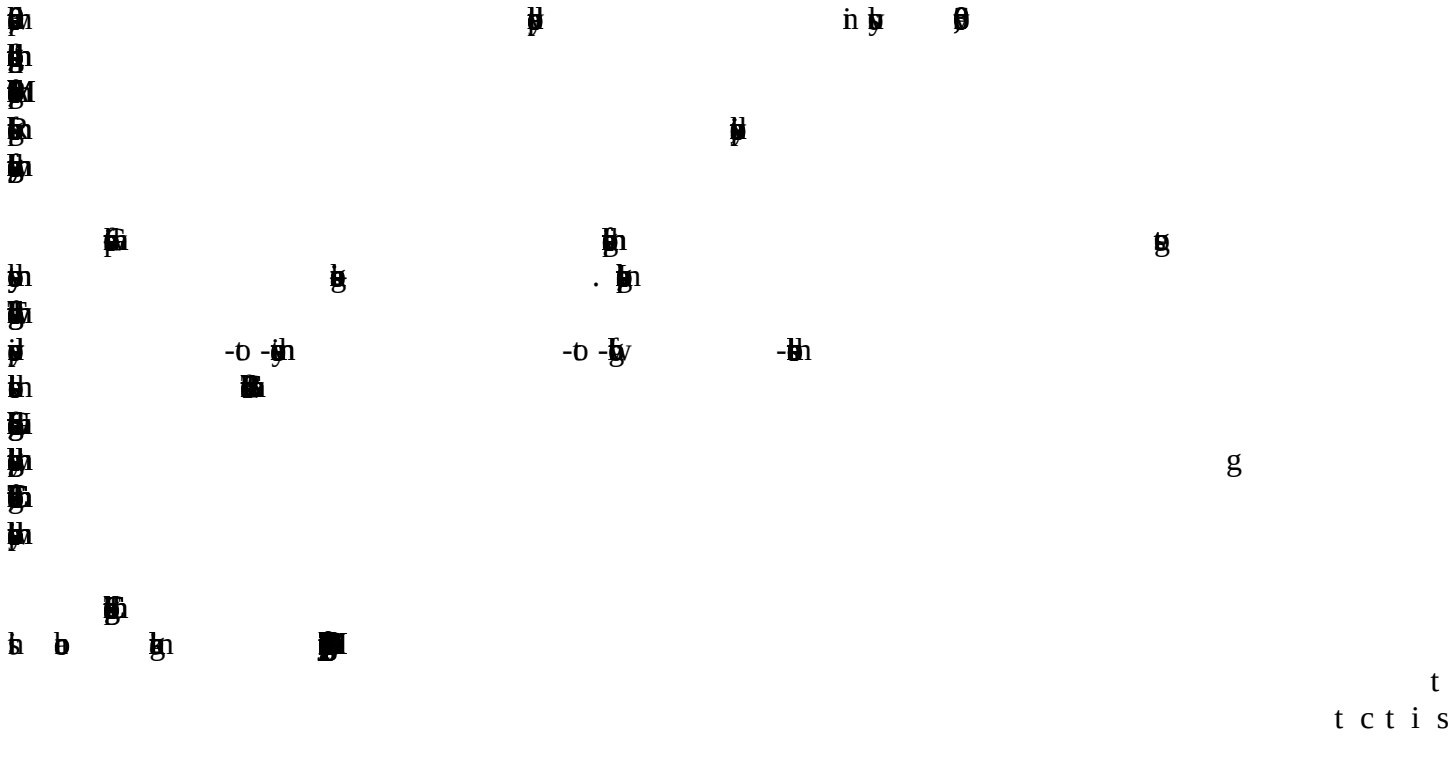
In the Matter of
Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991,
Notice of Proposed Rulemaking
CG Docket No. 02-278; FCC 16-57

Comment of the Staff of the Federal Trade Commission's Bureau of Consumer Protection

June 6, 2016

I. INTRODUCTION

II. RULEMAKING BACKGROUND



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IV. SPECIFIC COMMENTS REGARDING FCC RULEMAKING PROPOSALS

A. Scope of Covered Calls

1. Default vs. Delinquency

3. Solely for the Collection of Government Debt

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C. Other Parameters of Covered Calls