The Child Support Directors Association of California (CSDA), on behalf of the 51 local child support agencies (LCSA), supports the Petition for Declaratory Ruling by Broadnet Teleservices LLC., CG Docket No. 02-278, requesting the Telephone Consumer Protection Act be declared inapplicable to federal, state, and local governments, or the agencies' designee, when such calls are made for official purposes. States' IV-D Child Support Enforcement agencies are required under Title IV-D of the Social Security Act (42 U.S.C. Sec. 651 et seq.) to provide services to the public, for the establishment of parentage, child support, and health insurance orders and to enforce those orders in the best interests of and for the support of the children.

Frequent communication and early intervention techniques to engage case participants and assist them in supporting their children as well as preventing accumulating arrears are made possible through the use of a variety of technologies designed to enhance services and communications with the case participants. Prohibiting the use of technology to promote early intervention strategies and assist case participants with communications related to payment reminders and/or upcoming court dates negatively impacts the families and children that rely upon child support as a needed source of income. The TCPA's consumer protections should not hinder government agencies' efficient, cost-effective use of technology to communicate with citizens, be it informing of situations, upcoming appointments or court dates, payment reminders, or other official business uses. CSDA, on behalf of LCSAs serving the families and children of California, respectfully request the pending petition for declaratory relief filed by Broadnet Teleservices LLC., be granted.