

**UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION**

In The Matter of Telemarketing Rulemaking –

FTC File No. R411001

**COMMENTS OF PERSONAL LEGAL PLANS, INC.
ON THE PROPOSED REVISIONS TO THE
TELEMARKETING SALES RULE**

COMPANY BACKGROUND

Personal Legal Plans, Inc. began its business twenty-one (21) years ago in Charlotte, NC, offering a group of professional services needed by families. These services include legal, tax and financial planning. Today, the company has offices in Charlotte, NC; Greensboro, NC; Winston-Salem, NC; and Atlanta, GA. The company has over 245 dedicated employees with annual sales in excess of \$8 million.

The company believes strongly in the services that it offers the public. Through its telemarketing efforts, the company educates people on the importance of protecting their family and property with a Will. The company offers a prepaid legal plan, whereby, a person can obtain an attorney prepared Will which is both affordable and easy to acquire. Because of our successful marketing efforts, today, we have over 200,000 clients who have Wills prepared. However, the need for our service is great because seventy-five (75%) percent of adults in American do not have Wills.

Over the years, our company has spent thousands of dollars in TV, radio, and newspaper ads to get our message across to the public. Unfortunately, none of these medias proved to be cost effective nor was our message fully understood by the public. However, once we introduced telemarketing to arrange face-to-face sales appointments, the public fully understood the value of the services we offered. In addition, because of lower marketing cost, we were able to make our services more affordable to a wider number of people. As an example, a couple can get an attorney prepared Will for a total cost of only \$99 through our service.

Our company is not only proud of the services we offer the public, but also the contributions we make to our community. As an example, our company and its employees sponsor the Annual Picnic for the Disabled each September and the Central Piedmont Community College Skyline Race in April.

SUMMARY COMMENTS

Our company supports the efforts of the FTC to investigate and eliminate fraud in the industry. It also supports the current Telemarketing Sales Rule. However, we cannot support the revisions proposed by the Commission in these proceedings, particularly a National Registry.

We are concerned that the FTC's proposed new Rule will do nothing to curtail the abusive and deceptive telemarketing practices of a few dishonest and unethical people. However, these revisions will place burdensome restrictions on our company and thousands of legitimate companies like ours. We are also very concerned that this proposed National Registry will have a significant impact on our company's ability to stay in business.

For the reasons set forth in the attachment enclosed, we believe the FTC should not implement a National Registry.

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