

community newspaper holdings, inc.



March 27, 2002

Office of the Secretary
Room 159
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

To whom it may concern:

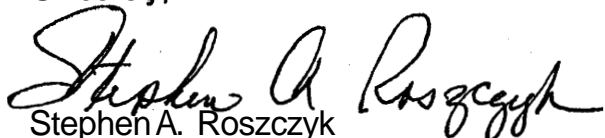
Please consider exempting newspapers from the proposed Telemarketing Sales Rules for the following reasons:

- A. **Places newspapers at an unfair competitive disadvantage;** Throughout the years, the industry has worked hard to establish and maintain ethical telemarketing standards by valuing its relationship with its customers and using telemarketing in a judicious manner. Subjecting newspapers to national DNC lists, restricting its ability to use out-of-state third party vendors and tightening "express verifiable authorization" rules would place newspapers at an unfair, competitive disadvantage by limiting its ability to attract new subscribers and maintain its current customer base.
- B. **Efficient and cost-effective telemarketing is essential to maintaining a newspaper's fiscal health:** Almost 60% of the industry's new subscriptions and upwards of 90% of subscription renewals are sold via telemarketing. The proposed interstate telemarketing rules would place an unfair financial burden on the industry, particularly small market newspapers and those with circulation that crosses state boundaries, by forcing many telemarketing functions "in-house". This would dramatically impact the operational functionality of the current business model.
- C. **Erodes the industry's fiscal health would ultimately restrict consumer choices:** Newspapers have a well established reputation for integrity, fairness and civic responsibility. This reputation is a result of the industry's ability to deliver a highly-valued news and information product. An erosion of the industry's fiscal health and current customer base could cause smaller or marginally profitable newspapers to fail thus limiting consumer choices of print media. In the process, limiting free speech and stifling diverse opinions.

D. Newspapers already have strong incentives to self-regulate its telemarketing: As noted earlier, newspapers have established and long maintained ethical telemarketing standards. Most newspapers operate in limited geographic markets and they have established reputations in their communities and avoid practices that lead to customer dissatisfaction. Because telemarketing is vital to survival, it is in the best interests of newspapers to continue to regulate its telemarketing practices and maintain high customer satisfaction levels.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Stephen A. Roszczyk". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Stephen A. Roszczyk

Vice President/Great Lakes Division

cc: Donna **Barrett**, CNHI
David Brown, NAA
Linwood Pride, CNHI