



National Association of RV Parks & Campgrounds

March 27, 2002

Federal Trade Commission  
Office of the Secretary, Room 159  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

Re: Telemarketing Rulemaking – Comment. FTC File No. R411001

The National Association of RV Parks & Campgrounds, on behalf of its members, submits the following comments in regard to the proposed rule:

1. It is the position of this association that the establishment of the “no call list” should exempt calls in which the sale of goods or services is not the purpose of the call and that payment or authorization of payment is not required until and unless there is a face to face sales presentation by the seller. We believe that this exemption is appropriate and provides sufficient protection from both abusive telemarketing practices and the frequency of unsolicited telemarketing calls since the purpose of the call is not to sell a product or service.
2. Further, we strongly believe that it is imperative that an additional exemption from the “no call list” be provided in cases where people have expressly requested that they be contacted by the caller. This will enable the telemarketer to meet the expressed desires and needs of the consumer and does not place the federal government in the position of making decisions for the consumer.
3. Finally, we further believe that there be an exemption from coverage under the rule in cases where the caller and the party called have an existing business relationship. For example, in the case of an individual who holds a membership in a private resort, the owner of the resort should be able to contact resort members even if their name is included in a “no call” registry. Further, it is our belief that companies should be permitted to create partnerships where one company offers, via a telephone contact, a unique benefit to their partner’s existing customers. This form of partnership marketing provides the customer with a value-added benefit that the FTC should not attempt to negate.

A national no call registry, were it in great demand by consumers, would have already been established by private enterprise as a commercial venture. Therefore, while it is our opinion that the No Call Registry is an intrusive and unnecessary attempt by the Federal Trade Commission to influence the free market system, we do feel that the commercial RV park and campground industry will not be greatly disadvantaged or damaged by the development of the No Call

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Registry *provided the above described exclusions and exemptions are part of the final rule that establishes a registry.* Failure to include these provisions will negatively impact on a growing consumer-oriented business and lifestyle enjoyed by millions of Americans.

The National Association of RV Parks & Campgrounds is the only national trade association representing the all segments of this industry. The association recently celebrated its 35<sup>th</sup> anniversary and has over 3800 members throughout the United States. The industry annually serves more than 100 million guests of all ages and has aggregate revenues of approximately \$6 billion,

We would be pleased to respond to any questions you have or provide any additional information about the RV park and campground industry and the role telemarketing plays in this industry.

Sincerely,



Linda Profaizer  
President & CEO

- cc. Randy Packard, ARVC Chairman
- Jim Rowley, Chairman ARVC Public Affairs Committee
- Lee Worcester, ARVC Secretary
- David **Gorin**, ARVC Public Affairs Consultant
- Aubrey King, ARVC Public Affairs Consultant