



**Special Olympics,
Arizona**

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

Re: Amendment to the Telemarketing Sales Rule

Chris Hite
CEO Special Olympics Arizona

To Whom It May Concern,

Special Olympics Arizona (SOAZ) provides, as part of the largest sports organization in the world, year round training and competition in 23 Olympic type sports for adults and children with mental retardation. More than 7,000 athletes and over 10,000 volunteers throughout the state of Arizona participate in this program.

It is the belief of Special Olympics that through sports training and competition, people with mental retardation benefit physically, mentally, socially and spiritually. Families will also be strengthened; and the community at large, both through participation and observation, will have a better understanding of people with mental retardation in an environment of equality, respect, and acceptance.

It has been brought to my attention that the FTC is currently considering a proposed amendment to the Telemarketing Sales Rule that would create a national registry for a do not call list. As I understand the amendment, the new list would not include politicians running for elections, banks soliciting credit cards, telephone companies, selling long distance service, and charities which make their own telephone calls for support.

I want to be on record as saying I am strongly against this amendment for several reasons:

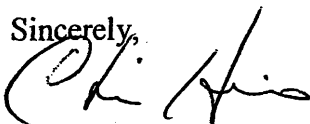
- Special Olympics Arizona is not large enough to employ the overhead of creating a telemarketing center. If I had to locally incur the cost of telemarketing the fundraising costs would be extremely high, and very little of the donations would return to the athletes in our program. Therefore, I rely on two very special professional telemarketing service companies that help me generate over \$250,000. In Arizona there are thousands of supporters that give \$25 or less per year through telemarketing donations or product

sales. Without **this** money, which would be about **15%** of my operating budget, Special Olympics **Arizona** could not provide **many** of the services needed to deliver **a** quality sports and training program. **This** would definitely not be fair to the athletes that count on these services on **a** daily or weekly basis.

- Nonprofits, like **SOAZ**, depend on **grass** roots fundraising and the proposed amendment to the Telemarketing Sales Rule will ultimately hurt all the nonprofits and charities which rely on telemarketing companies to raise money to fund their program services. At **a** time when government is budgeting to do less and less, the public depends more and more on charities and nonprofits to provide social services **and** other forms of public good. The government should not be imposing restrictions that make the funding of these projects more difficult.
- Telemarketing continues because it works! Many people want to receive calls to support non-profit organizations. I have many donors that do not want to be bothered with direct mail, but would rather get **a** phone call once or twice a year. That is their preference and I intend to give them that preference. When people stop giving over the phone, charities and nonprofits will stop calling them. It is the American way. We don't need government intervention.
- Since the FTC does not have jurisdiction to regulate politicians soliciting for financial support in elections, or **banks** that are insured by the FDIC, or telephone companies selling long distance service regulated by the FCC, or charities making their own phone calls for support,.....why does the FTC believe that a new national do not call list will solve all of the existing public concerns. The problem areas are the calls being made outside of the jurisdiction of the FTC. The real problems that need **to** be fixed are under jurisdiction of the FDIC and FCC. Why should SOAZ be penalized for paying a third party telemarketing company to provide a more efficient professional, and reliable service to our donors.
- How does the FTC plan to enforce **this** amendment? Will there be lawsuits against charities for soliciting money? **Will** we need to pay lawyers to defend non-profits in court? What if someone moves and gets a new phone number, is that new number on the list? How do I know if someone added my name to the list without knowing?

Unfortunately, people usually do not give money to charities unless someone asks them to, and it is my obligation to the thousands of athletes, parents, coaches, and volunteers in the state of Arizona to be on record as adamantly opposed to the FTC amendment for creating a do not call list **that** would extend to and include calls made on behalf of Nonprofit Organizations. Thank you for your consideration.

Sincerely,



Chris Hite

CEO Special Olympics Arizona