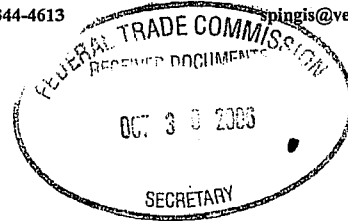


Stuart P. Ingis

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October 30, 2006

***Via Hand Delivery***

Mr. Donald S. Clark, Secretary  
Federal Trade Commission  
Room H-159 (Annex K)  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Re: TSR Prerecorded Call Prohibition and Call Abandonment Standard Modification  
Project Number: R411001  
Request for Extension of Time to File Comments

Dear Secretary Clark:

The Direct Marketing Association requests that the Commission grant an extension of time of 40 days to file comments in the above-captioned proceeding.

DMA has filed comments in the various Telemarketing Sales Rule rulemaking proceedings and intends to provide the Commission with comments on the Notice of Proposed Rulemaking issued on October 4, 2006. DMA requests this extension for three reasons:

- First, the additional time will allow it to further compile information from its members to submit into the record that is essential to the Commission's proposals.
- Second, the Commission's October 4 notice represents a departure from its prior proposal to allow the types of calls it now proposes to prohibit, and DMA needs this time to formulate its comments.
- Third, given that the Commission's current enforcement policy allows the prerecorded calls in question to be made, there will be no change to the status quo with an extension; that is, consumers will receive the same protections they have received since the Commission's prior proposal.

Mr. Donald S. Clark  
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This extension of time would, thus, afford interested parties the opportunity to meaningfully respond to the proposals that have been advanced, and provide the Commission a full and current record upon which to base its decision without causing harm to legitimate consumer and business interests. For these reasons, DMA respectfully asks the Commission to extend the comment deadline by 40 days.

Please contact me with any questions.

Sincerely,

Stuart P. Ingis

cc: Lois C. Greisman (*via e-mail*)  
Allen Hile (*via e-mail*)  
Craig Tregillus (*via e-mail*)  
  
Jerry Cerasale (*via e-mail*)