

Mr. David Skinner  
In-Home Lenders Inc.  
Arkansas  
United States

We have found that updates at three month intervals result in a large number of invalid complaints. Because of the high cost of our dealing with these invalid complaints, we are now updating our DNC list on a relaxed monthly schedule, every 30 to 60 days we download updates.

I do believe that a requirement to update every 45 days or every 60 days is reasonable and appropriate and beneficial.

I believe that a requirement to update every 30 days is completely absurd and is unreasonable and is just not needed. Some months have more than thirty days, making impossible to schedule an update on the 15th of every month, making it impossible to schedule an update on the first Tuesday of every month. Sometimes there are reasons why an update might not take place as scheduled, due to problems with the Internet, due to technical difficulties in the office, due to staff members missing work because of the flu.

If we have to comply with a regulation that requires compliance every thirty days, we have to take into consideration the possibility that things will not go as scheduled. Downloading an updated file is only a small part of the job of compliance with the DNC. Because we are a small company, there are not likely to be any benefits to us or to the consumer for us to update more often than every 45 days.