Comment #: 32 February 20 2004

Mr. Chris Cage Brink's Home Security, Inc. Texas United States

Brink's Home Security installs and monitors security systems across the U.S. We currently have over 2600 employees and over 800,000 customers. Brink's Home Security does not do outbound "cold calling." However, we do call prospects who have been referred to us by other customers. In making these calls, we are complying with the Do Not Call law and update our Do Not Call list every three months.

Brink's Home Security opposes the proposed rule that would require updating the list monthly. It is a significant administrative burden to update our DNC list and requiring a monthly update will make this much worse. The three month rule was broadly communicated to consumers enrolling onto the DNC list and businesses required to comply with the new Do Not Call laws. Businesses like Brink's developed their compliance procedures and systems based upon the three month requirement. We are now being faced with changing the update period before the law is even six months old. Reducing the time for updates will provide little benefit to the public because an increasingly fewer number of citizens will add their name to the DNC list each month.