

Mr. Owen O'Neill  
TCIM Services, Inc.  
Delaware  
United States

Below are our comments regarding this proposal.

- 1) Quarterly access seems adequate to ensure that the wishes of residential telephone subscribers are honored. However, changing to "every 30 days" instead of "monthly" access should not present a problem to our company. Although "monthly" implies once during the month and normally at the same time of the month is self-evident to many, the specificity of a 30-day cycle may be necessary to prevent circumvention of the rule by those who would otherwise seek to break it.
- 2) A ninety-day effective date timeframe would provide sufficient time for companies to: a) change their procedures, b) modify computer systems and control mechanisms, c) modify their recordkeeping, and d) re-train employees who are responsible for accessing the registry. It would also provide sufficient time to test the new process in order to ensure compliance on the effective date.
- 3) The proposed change is not expected to have any significant changes of adverse affects on our company.
- 4) The downside of federal legislation changes is that the states soon tend to follow with more restrictive premutations and compliance-related difficulty. We believe that the national do not call registry offers one stop shopping, and that it satisfies all residential telephone sunscriber wishes to not be called. We believe that the state-run no call lists are excessive, wasteful and unnecessary; and that the national registry should pre-empt all state no call lists.