

Mr. Wayne Strang
None
California
United States

The Commission should adopt the 30-day deadline for adherence to the ban on telemarketing calls to numbers included in the national do-not-call database.

Such action would bring the TSR into line with the FCC's requirement that company specific do-not-call requests be honored no later than 30-days after the request is made.

It would also limit consumers' potential exposure to unwanted calls after entry of their number into the database.

Such a change would not cause significant harm to the industry, other than some increased overhead in running their scrub programs 12 times per year. The cost of acquiring the database itself will NOT increase, as the cost structure set up by the Commission requires payment only once every 12-months.

In addition, though not a part of this NPRM, the Commission should firmly REJECT any industry request to raise the 3% threshold on the abandoned call "safe harbor". Complaints have been received by the FCC indicating the industry has suffered a 20-40% decline in efficiency since adoption of the rule.

This begs the question, "How many calls were you abandoning PRIOR to the new rule?". The answer is 10's if not 100's of millions per year.