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I support a 30 day grace period rather than the current 3 months before a phone number becomes effective in the National Do Not Call list. Three months allows for a lot of unwanted calls.

I suggest having updates that provide all additions and deletions during the period since their last download. That would avoid companies having to scrub against the entire list and ensures that updating monthly is an easy process.

I would also suggest the FTC ask congress for authority to grant consumers a private right of action similar to the rights in 47 USC 227(b)(3) and 47 USC 227(c)(5). That way consumers can help enforce the TSR without having to depend on the FTC whichever length grace period you choose. Any right of action should be for each violation of the TSR.

Jeff Mitchell