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THE PLAIN DEALER

OHIO'S LARGEST NEWSPAPER
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CLEVELAND, OHIO 44114

Federal Communications Commission
Office of the Secretary
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OFFICE OF
ALEX MACHASKEE
PRESIDENT and PUBLISHER

May 19, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

92-90/

Dear Ms. Searcy:

As Publisher of The Plain Dealer, Ohio's largest newspaper, I am writing to express my concern about provisions of the Telecommunications Act of 1991. It is my understanding that the Federal Communications Commission has issued a notice of proposed rulemaking.

We recommend that the FCC not implement a national database of telephone numbers off limits to telemarketing services.

Telemarketing is the primary method of acquiring new subscribers for The Plain Dealer. We make more than 20,000 phone calls per week. None of these calls are made before 9:30 a.m., nor are any made after 8:30 p.m.

This is a mobile society. Telemarketing is important because there is a high turnover of subscribers. People constantly move and change addresses, usually in the same circulation area. Telemarketing is essential to retaining newspaper readership.

The Plain Dealer serves the community interest by making news and advertising information available to the public. Providing access to our publication is most effectively and efficiently done by telephone solicitation.

Rather than a national database, I would contend that newspapers are best able to maintain their own internal "do-not-call" lists.

This would allow access to individuals who may object to certain telemarketing calls, but who may be very open to a newspaper solicitation.

Ms. Donna R. Searcy
May 19, 1992
Page -2-

The Plain Dealer even now voluntarily honors the requests of telephone subscribers who do not want to be solicited by us. Any person who objects has their name and telephone number deleted from our computer database. There is no reason to impose a heavy-handed and inefficient national database.

I thank you for your consideration on this matter.

Sincerely,



Alex Machaskee

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