

# The Star-Ledger

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MAIL SECTION

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May 26 1 31 PM '92 (201) 877-5890

RECEIVED BY  
May 22, 1992

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

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Federal Communications Commission  
Office of the Secretary

Re: CC Docket No. 92-90

Dear M. Searcy:

The FCC recently issued a Notice of Proposed Rulemaking regarding telemarketing activities by private businesses. I am writing to note my concern with the FCC's consideration of a national database of consumer telephone numbers that could not be solicited by phone.

The Star-Ledger obtains 3200 to 3500 new subscriptions each week as a result of a courteous telephone solicitation campaign. Subscriptions obtained through telemarketing represent 90% of the new subscriptions that we receive. Since many residents move each year, we are constantly seeking new subscribers. Accordingly, our ability to continue to solicit new subscriptions by phone is absolutely necessary for our newspaper to be successful.

I am concerned that a national database will adversely affect newspapers by forcing individuals who might otherwise be willing to subscribe to our newspaper to make a blanket decision as to not receiving any telemarketing calls. Also, such database will no doubt be costly and difficult to administer.

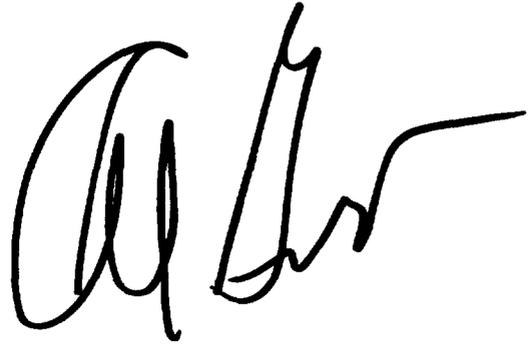
We are sensitive to the fact that certain individuals do not wish to receive telephone solicitation. As a result, we have established a "Do Not Call" list of subscribers and non-subscribers who have instructed us not to solicit them by phone. We constantly update this list to ensure that our telemarketing efforts do not disturb these individuals.

Our company list adequately safeguards those individuals who do not wish to receive telephone solicitations while ena-

bling us to achieve our goal of increasing our subscriber base. In our view a Company generated "Do Not Call" list will be more accurate and efficient than a national database and will allow individuals freedom of choice as to whether or not they wish to receive calls from particular businesses. Accordingly, we hope that you will reject the need for a national database.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be "ADG", with a long horizontal flourish extending to the right.

ADG/jp