

The Hartford Courant

DISTINGUISHED SERVICE
SINCE 1764

RAYMOND A. JANSEN
PUBLISHER AND
CHIEF EXECUTIVE OFFICER

FCC MAIL SECTION

May 27 11 34 AM '92

RECEIVED BY

May 22, 1992

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

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Federal Communications Commission
Office of the Secretary

Reference: CC Docket No. 92-90

Dear Ms. Searcy:

I am writing to you on behalf of The Hartford Courant in Hartford, CT, in regard to pending implementation of regulations that would negatively impact our newspaper telemarketing practices. Specifically:

- * Prohibiting the use of artificial or prerecorded voice machines without prior consent of the called party.
- * The possibility of the creation of a national database which would consist of residential telephone subscribers objecting to telemarketing solicitations which would be off-limits to calls.

As a newspaper, we rely on the use of the telephone for the collection of newspaper subscriptions which are past due. While at the present time we do not use an artificial or prerecorded voice system, there should be an exemption for its use in calling customers for noncommercial purposes such as debt collection. The business relationship has already been established with these customers and to restrict our ability to contact them with a prerecorded or artificial voice message about a billing issue would reduce our collection options and potentially increase our costs of collections.

The use of telemarketing is our primary source for subscription sales. Any national restrictions such as the creation of a national database would literally tie our hands as we continue to promote the use of the daily paper as a source of local and national issue, consumer information and much more.

May 22, 1992

We also promote literacy through the reading of a daily paper. Our ability to use the telephone to inquire about interest in reading and subscribing to a newspaper should not be controlled on a national level. Since we are only calling a local area, the accessing of a national database list seems impractical and the potential increase in operating costs to do so would be difficult to face at this time with the present economic climate.

Since we only call on a local basis, we would be more supportive of a Company-based No Solicit or Do-Not-Call system. With this type of system, which we already have in use, we are able to handle any requests from those who don't wish to be called. This list is maintained on a permanent basis until the requestor initiates a removal request from our no solicit list. This system works quite well for us as it is controlled by us and is in our best interest not to upset the customers within the community.

As a prominent and responsible business in the community in which we serve and as a user of telemarketing for sales purposes, it is in our best interest to understand the customers' concerns about unwanted solicitation calls. As a provider of news and information, it is also important for our industry to have the ability to serve the reader through the sales and service of our news products using various methods. Restriction on our ability to sell our product limits our capability to deliver the news and information that is so vital to the daily lives of the people in our state.

Cordially,



Raymond A. Jansen

RAJ/bf