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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C.

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Federal Communications Commission
Office of the Secretary

In the Matter of
The Telephone Consumer Protection
Act of 1991

CC Docket No. 92-90

COMMENTS OF THE
INTERNATIONAL COMMUNICATIONS ASSOCIATION

The International Communications Association ("ICA"), by its attorney, hereby submits its initial comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM or Notice"), CC Docket No. 92-90, released April 17, 1992.

ICA is the largest nonprofit association of telecommunications users in the world, with more than 700 members who spend at least \$1 million per year upon acquisitions of services and equipment. Because of its growing membership, and their increasing reliance on public telecommunications, ICA members' expenditures on telecommunications are growing rapidly. Recent estimates indicate ICA members spend approximately \$23 billion on telecommunications services and equipment. ICA speaks with a telephone customer perspective that is broadly informed on the state of the telecommunications industry in the United States. Thus, ICA members are without question the largest users of telecommunications equipment and services in America.

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Accordingly, ICA has a vital interest in the Commission's implementation of Public Law 102-243, the Telephone Consumer Protection Act of 1991. ICA will review the initial comments on the Commission's tentative proposals dealing with, among other things, use of automatic telephone dialing systems and telephone facsimile machines, and file the response of the large user community in its reply comments.

Respectfully Submitted,

INTERNATIONAL COMMUNICATIONS ASSOCIATION

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