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May 15, 1992

ORIGINAL
FILE

Ms. Olga Madruga-Forti
Common Carrier Bureau
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED

JUN - 2 1992

FEDERAL COMMUNICATIONS COMMISSION
OF THE SECRETARY

Ref: Public Law 102-243

Dear Ms. Madruga-Forti:

I am writing to let you know where our business stands regarding Public Law 102-243.

The company that we contract with to do our circulation telemarketing employees one full-time person and up to fifteen part-time people. The 30,000 new subscribers that we receive from the telemarketing process generate in excess of one million dollars in revenue for us each year. About one-third become long term subscribers that generate revenues for several years. These subscriptions help build the businesses of the 597 independent contractors that deliver our newspaper, helping them to make more money. We use the predictive dialer to call all new starts from all sources to verify that service has begun, and that the bill has been received and understood.

In our telemarketing program, we always have a live operator to answer the telephone when the potential customer answers the call.

The predictive dialer allows us to be very efficient. Our number of subscriptions per hour worked has almost doubled since we changed from manual calling.

The predictive dialer not only allows us to be more efficient, but also has several features that help us to protect our market. One feature is a "Don't Call" list that keeps any phone number on the list from being called. We have entered all the numbers of people who have requested that we not call them. We have less than 3,000 numbers which have accumulated over the past 15 years. Our special number file also contains emergency numbers, police stations, and businesses that have multi-line phone systems that we never want to call. We filter out and do not call our current subscribers, businesses, numbers called within the past 90 days, and the "Don't Call" list.

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It is very important to our newspaper and to our advertisers that we sell new move-ins as soon as possible. For this reason, we do call all numbers in an exchange in a geographical area. This also allows us to contact people of all demographics.

I appreciate your taking the time to review our procedures and considering our position concerning Public Law 102-243.

Sincerely,

A handwritten signature in cursive script that reads "Ed Ketron". The signature is fluid and includes a large loop at the end.

Ed Ketron
Circulation Marketing Manager