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July 29, 1992

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

Re: Ex Parte Presentation
CC Docket No. 92-90

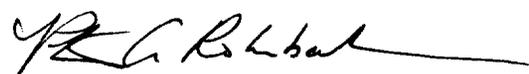
Dear Ms. Searcy:

Please be advised that today Michael Hoffman, Chief Executive Officer of LeJeune Associates of Florida ("LeJeune"), as well as Christy Kunin and myself of this office, met with Abraham Leib and Suzanne Hutchings of the Domestic Services Branch. The purpose of the meeting was to discuss LeJeune's position in the above-referenced proceeding, as well as the attached discussion material.

If any questions arise in connection with this matter, please contact the undersigned.

Respectfully,

HOGAN & HARTSON

By 
Peter A. Rohrbach

Attorneys for LeJeune
Associates of Florida

cc: Abraham Leib
Suzanne Hutchings

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**LEJEUNE ASSOCIATES OF FLORIDA
NATIONAL DATABASE PROPOSAL**

* **CONGRESS REQUIRED THE FCC TO REGULATE LIVE TELEPHONE SOLICITATIONS**

- Congress' intent was to regulate live solicitations.
- Live solicitation is a problem.
- Industry self-regulation is ineffective.

* **A NATIONAL "DO NOT CALL" DATABASE CAN BE IMPLEMENTED EASILY AT REASONABLE COST**

- A national database can be implemented without cost to consumers.
- Cost of compliance would be minimal for telemarketers (see attached Cost Summary) and would facilitate compliance with regulations in all states.
- The database could be updated quarterly. Consumers would be informed when their listing would take effect. Customers would be informed that exempted calls would continue.
- Customer moves could be easily incorporated into the database through cooperation with local phone companies.

* **A NATIONAL DATABASE WILL SIMPLIFY ENFORCEMENT**

- Using the national database would be prima facie evidence of TCPA compliance.
- Only with the national database option is there a bright line standard for enforcement of the TCPA.

* **A NATIONAL "DO NOT CALL" DATABASE IS THE ONLY EFFECTIVE ALTERNATIVE TO PROTECT CONSUMER PRIVACY.**

- A national database is flexible and enhances consumer choice.
- Consumers could restrict all calls by placing their number in the database.
- Consumers could receive some calls from industries groups they select or companies they contact directly.
- Consumers could receive all calls from telemarketers by not entering their name in the database.
- Only a national database provides the consumer with every option.

COST SUMMARY

LeJeune Associates of Florida National Database Proposal

System Costs

Computer and Software	\$250,000
Publicity	\$335,000
Subscriber and Telemarketer Registration	\$13,300,000
Subscriber Complaints and Confirmation	\$6,000,000
Number Change Updates	\$65,000
Database Distribution	<u>\$250,000</u>

TOTAL \$20,200,000

List Purchase Prices

On Diskette:

National List	\$750/quarter, \$3,000/year
Regional List	\$350/quarter, \$1,400/year
State List	\$150/quarter, \$600/year
Area Code List	\$50/quarter, \$200/year

Paper Printout:

Area Code or Exchange	\$25/quarter, \$100/year
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LeJeune System Purchase Prices (including software & updates)

Single Line System \$995

Multiline Systems (lease options are available)

Cost per line varies from approximately \$2,000/line for a 4-line system to approximately \$500/line for a 40-line system.