

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991)	CG Docket No. 02-278
)	
Petition for Expedited Declaratory Ruling of the Insights Association)	

REPLY TO COMMENTS

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REPLY TO COMMENTS

The Insights Association, Inc. (“Insights Association”) and the American Association for Public Opinion Research (“AAPOR”) (collectively, “Petitioners”) are leading trade associations for the survey, opinion and market research industry. Together, they filed a petition for declaratory ruling (the “Petition”) on October 30, 2017, asking the Commission to clarify four areas under the Telephone Consumer Protection Act (“TCPA”) which directly impact their industry, including that “communications are not presumptively ‘advertisements’ or ‘telemarketing’ under the TCPA simply because they are sent by a for-profit company, or might be for an ultimate purpose of improving sales or customer relations.”¹

The Consumer & Governmental Affairs Bureau sought comment on the Petition on May 23, 2018. Since that time, ***at least 235 members from Insights Association and AAPOR*** have filed comments requesting the Commission adopt the rulings suggested in the Petition.²

This overwhelming response further proves the Petition’s argument: Namely, that in spite of decades’ worth of direction from the Commission that survey, opinion, and market research is *not* telemarketing, the market research industry has come under assault by a predatory plaintiffs’

¹ See *Petition* at 1 (requesting the following four rulings: “(1) communications are not presumptively “advertisements” or “telemarketing” under the TCPA simply because they are sent by a for-profit company, or might be for an ultimate purpose of improving sales or customer relations; (2) the presence in a communication, or some other ancillary document or webpage, of a marginal element that might arguably be considered advertising does not convert the communication into a “dual-purpose” communication; (3) survey, opinion, and market research firms are not subject to the Commission’s vicarious liability regime as articulated in *Dish Network*; and (4) survey, opinion, and market research studies do not constitute goods or services *vis-à-vis* the respondent (the participant in a research study), and are not transformed into goods or services merely because they include some nominal inducement to participate”).

² See Exhibit A, attached hereto, for a list of members who have commented.

bar, and urgent action is needed to curb TCPA abuses. Petitioners again reiterate their call for the Commission to adopt the rulings suggested in the Petition.

Among the comments filed since May 23, Petitioners locate only one in opposition to the Petition (the “A+W Comment”).³ For the following reasons, Petitioners believe the A+W Comment misrepresents the Petition, and is ultimately unpersuasive.

I. THE “ARGUMENT FROM THE PROFIT MOTIVE” HAS BEEN APPLIED TO BOTH SURVEY AND NON-SURVEY COMMUNICATIONS, AND SHOULD BE REPUDIATED, AS A GENERAL MATTER, BY THE COMMISSION

The A+W Comment argues that three cases cited in the Petition—*Physicians Healthsource, Inc. v. Boehringer Ingelheim Pharms., Inc.*;⁴ *Sandusky Wellness Ctr., LLC v. Medco Health Sols.*;⁵ and *Physicians Healthsource, Inc. v. Stryker Sales Corp.*⁶—are “radically misconstrue[d]” by Petitioners, because the faxes at issue in these cases did not involve “survey, opinion, and market research studies.”⁷ According to A+W, “[a] closer reading of these cases demonstrates that the Insights Petition presents no genuine ‘controversy’ or ‘uncertainty’ for the Commission to resolve.”⁸

Petitioners response to this objection is three-fold. First, the Petition does not, in fact, suggest that the faxes at issue in *Boehringer*, *Stryker Sales*, and *Medco* were surveys. The Petition clearly explains that *Boehringer* and *Stryker Sales* involved seminar invitations, and that

³ Anderson + Wanca’s Comments on Petition for Declaratory Ruling of Insights Association and AAPOR, CG Docket No. 02-278 (June 22, 2018).

⁴ 847 F.3d 92 (2d Cir. 2017).

⁵ 788 F.3d 218 (6th Cir. 2015).

⁶ 65 F.Supp.3d 482 (W.D. Mich. 2015).

⁷ *A+W Comment* at 2.

⁸ *Id.*; see 47 CFR § 1.2(a) “The Commission may, in accordance with section 5(d) of the Administrative Procedure Act, on motion or on its own motion issue a declaratory ruling terminating a controversy or removing uncertainty.”

Medco involved an informational list of medications.⁹ These cases were cited to illustrate the “argument from the profit motive,” which has the potential to affect any number of communications, including but not limited to surveys, that have traditionally been exempted from the FCC’s conceptions of “advertising” and “telemarketing” under the TCPA.¹⁰

Second, the A+W Comment treats the three cases mentioned above as a group, and suggests that, because they did not involve surveys, they are somehow irrelevant to Petitioners concerns. In so doing, A+W glosses over the fact that these cases are *directly at odds with one another*. The *Boehringer* court, in concluding that informational faxes may be advertisements, reasoned that “[b]usinesses are always eager to promote their wares and usually do not fund presentations for no business purpose.¹¹ Likewise, the *Stryker Sales* court reasoned that “the information referenced on the fax could have led primary care physicians to refer more patients or discuss orthopedic products more frequently, and this in turn could stimulate demand for Defendants’ products.”¹² Each of these were examples of the “argument from the profit motive” which Petitioners have requested the Commission correct. In contrast, the *Medco* court explained that “[t]he fact that the sender might gain an ancillary, remote, and hypothetical economic benefit later on does not convert a noncommercial, informational communication into a commercial

⁹ See *Petition* at 13 (“In *Physicians Healthsource, Inc. v. Boehringer Ingelheim Pharmaceuticals, Inc.*, the Second Circuit was asked to consider whether a seminar invitation constituted an advertisement under the TCPA.”); *id.* at 11 (“Likewise, in *Physicians Healthsource, Inc. v. Stryker Sales Corp.*, a district court in Michigan held in 2015 that a defendant’s seminar invitation could be an advertisement under the TCPA.”); *id.* at 15 (“In *Medco*, the defendant sent a fax listing medications available through a particular health plan.”).

¹⁰ See *Petition* at 1 (requesting a ruling that all “communications,” not just surveys, “are not presumptively ‘advertisements’ or ‘telemarketing’ under the TCPA simply because they are sent by a for-profit company”).

¹¹ 847 F.3d 95-96 (2d Cir. 2017) (emphasis added).

¹² 65 F.Supp.3d at 493 (emphasis added).

solicitation.”¹³ This rationale was offered by Petitioners as an alternative route for the Commission to formally endorse. As highlighted in the Petition, the differences between these cases is precisely the kind of “uncertainty” or “controversy” which the Commission can — and should — clarify.

Third, the A+W Comment conveniently fails to mention that the Petition’s *lead example* of the “argument from the profit motive” is *Samuel Katz v. American Honda Motor Co., Inc.*,¹⁴ a TCPA class action involving customer service surveys. In *Katz*, the plaintiff argued that the calls were made “with the ultimate purpose of building clientele and repeat customers.”¹⁵ Despite no support for this anywhere in the TCPA or the FCC’s previous guidance, the court bought the plaintiff’s argument, reaching the conclusory determination that “the calls to Plaintiff were advertising because they were made for customer service purposes *and to increase future sales and revenue.*”¹⁶ As argued in the Petition, the court’s conclusion was in direct contradiction with decades of the Commission’s guidance on market research and surveys, and with the Commission’s guidance on customer service calls in particular.¹⁷ In short, the Petition highlights a number of cases which illustrate the “argument from the profit motive,” some of which involved surveys and some of which did not. The A+W Comment ignores this fact.

¹³ 788 F.3d at 225.

¹⁴ Order Re: Defendants’ Joint Motion for Summary Judgment, No. 2:15-cv-04410 (C.D. Cal. May 12, 2017) (“*Katz MSJ Denial*”).

¹⁵ First Amended Class Action Complaint, *Samuel Katz v. American Honda Motor Co., Inc.*, No. 2:15-cv-04410 (C.D. Cal. Aug 19, 2016) (“*Katz Complaint*”) (emphasis added).

¹⁶ *Katz MSJ Denial* at *4 (emphasis added).

¹⁷ See *Petition* at 10-11 (discussing the Commission’s conclusion that certain kinds of customer service calls may constitute telemarketing, but only if they also incorporate a direct link to marketing or sales efforts).

II. MISAPPLICATIONS OF THE COMMISSION’S “PRETEXT” RULES IN THE FAX CONTEXT HAVE BROADER IMPLICATIONS FOR ALL “DUAL-PURPOSE” COMMUNICATIONS

The A+W Comment also contends that *Comprehensive Health Care Systems of the Palm Beaches, Inc. v. M3 USA Corporation*¹⁸ is irrelevant to Petitioners’ arguments around “dual-purpose” communications because *M3* “does not mention the word ‘purpose,’ let alone ‘dual-purpose’ and does not rely on the ‘dual-purpose’ ruling in the 2003 Order in any way.”¹⁹ According to A+W, because the *M3* case involved the Commission’s 2006 Junk Fax Order,²⁰ and specifically the ruling that a fax may be a mere “pretext” to a later advertisement, it does not illustrate a conflict or uncertainty with respect to the Commission’s broader “dual-purpose” framework.

But A+W ignores the fact that the Commission’s “pretext” rules, in the fax context, extend directly from broader questions about the “purpose” of a communication. When the Commission first laid down its “pretext” rule in 2006, it cited to the TCPA’s “telephone solicitation” definition: “the initiation of a telephone call or message *for the purpose of* encouraging the purchase or rental of, or investment in, property, goods, or services.”²¹ In other words, the reason for the Commission’s “pretext” rule is that a “pretextual” fax is in fact a kind of “dual-purpose” communication. The *Boehringer* court’s analysis is also instructive on this score. After citing the Commission’s *Junk Fax Order*, the court reasoned as follows: “where it is

¹⁸ Order on Defendants’ Motion to Dismiss and Motion to Stay, *Comprehensive Health Care Sys. of the Palm Beaches, Inc. v. M3 USA Corp.*, No. 16-cv- 80967, 2017 WL 108029 (S.D. Fla. Jan. 11, 2017).

¹⁹ *A+W Comment* at 5.

²⁰ *In the Matter of Rules & Regulations Implementing the Telephone Consumer Protection Act of 1991; Junk Fax Prevention Act of 2005*, Report and Order and Third Order on Reconsideration, 21 FCC Rcd. 3787 (2006) (“*Junk Fax Order*”).

²¹ *Id.* at ¶ 54 (“Finally, we conclude that any surveys that serve as a pretext to an advertisement are subject to the TCPA’s facsimile advertising rules.”) (citing 47 U.S.C. § 227(a)(4) and 47 C.F.R. § 64.1200(f)(10));

alleged that a firm sent an unsolicited fax promoting a free seminar discussing a subject that relates to the firm's products or services, there is a plausible conclusion that the fax *had the commercial purpose* of promoting those products or services.”²² More generally, and as discussed below, it is simply incorrect for A+W to suggest that the fax and telephone rules exist in non-overlapping spheres.

III. THE A+W COMMENT ATTEMPTS TO CREATE A FALSE WALL BETWEEN TELEPHONE AND FAX RULES WITH RESPECT TO VICARIOUS LIABILITY AND THE NATURE OF MARKET RESEARCH

In addition to misrepresenting the nature of the “pretext” rule, the A+W Comment attempts to carve out faxes from the purview of the Petition in two other ways. First, A+W notes that the *Dish Network* decision concerned telephone calls, not fax communications, and that the Commission and courts generally decline to go through a “vicarious liability” analysis at all in the fax context. Of course, insofar as A+W is asserting that market research firms should never be liable in the fax context when communicating on behalf of a corporate client, Petitioners agree. However, Petitioners strongly disagree that the vicarious liability rules as they relate to market research firms, regardless of the mode of communication, do not present any uncertainty or controversy for the Commission to address. In Petitioners' view, a generalized ruling from the Commission that its vicarious liability rules are specific to telemarketing, and do not apply to survey, opinion, and market research, would bring much-needed clarity to an area where much uncertainty still exists.

²² 847 F.3d at 95-96; see also *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Petition for Expedited Declaratory Ruling of M3 USA Corporation, CG Docket No. 02-278 (March 20, 2017).

Second, A+W echoes its earlier pronouncements that the Petition's citations to *Boehringer*, *Stryker Sales*, and *Medco* are inapposite to the questions at hand, and argues that these cases present no controversy or uncertainty. Here, Petitioners reiterate their earlier responses: these three cases were presented together with *Katz* (which *was* about survey research); these three cases are in conflict with one another; and the "argument from the profit motive" is directly relevant to all "informational" or non-telemarketing communications, including but not limited to surveys. Because courts, as illustrated by the Petition (and as illustrated by the Commission's repeated need to mark out research from marketing over the years), do in fact struggle to understand the business model of survey, opinion, and market research firms, the fourth issue raised by Petitioners likewise presents an uncertainty or controversy for the Commission. The aim of Petitioner's fourth requested ruling is simply for the Commission to elaborate on its long-established position on market research. This ruling would have general application to both telephone calls and fax communications.

IV. THE A+W COMMENT CONFLATES LEGAL AND FACTUAL ISSUES, AND IS DISMISSIVE OF THE COSTS OF DISCOVERY

Finally, the A+W Comment seems to argue that, because a number of the court rulings cited by Petitioner occurred at the pleading stage, somehow these cases are less important, or do not present uncertainty or controversy ripe for consideration by the Commission.²³ Petitioners would like to note that this argument from A+W is unsurprising, given how critical it is to the

²³ See *A+W Comment* at 3 (The Second Circuit reversed the dismissal, ruling that "at the pleading stage, where it is alleged that a firm sent an unsolicited fax promoting a free seminar discussing a subject that relates to the firm's products or services, there is a plausible conclusion that the fax had the commercial purpose of promoting those products or services." (emphasis in *A+W Comment*)); *id.* at 6 ("The court did not rule that the faxes "were . . . mere 'pretexts,'" as the Insights Petition incorrectly states; it merely ruled that the plaintiff had adequately alleged a pretext to survive a motion to dismiss and obtain discovery.").

business model of a certain segment of the plaintiff's bar that a high number of TCPA cases proceed to discovery. This is exactly the problem Petitioners are trying to address, and exactly why 235 Insights Association and AAPOR members have filed comments in support of the Petition. Law firms like A+W often file unwarranted TCPA suits knowing that, precisely because of the kind of areas of uncertainty highlighted by the Petition, legitimate, well-intentioned businesses will be forced to settle these cases for high dollar values or else risk proceeding through a protracted and costly litigation process.

The fact is the questions presented by the Petitioners are *questions of law*, not questions of fact, and questions which can (and should) be entertained and addressed by courts at the pleading stage. Additional guidance from the Commission, therefore, on the four points raised by Petitioners will provide much needed clarity, and will allow courts to better understand how market research is treated under the TCPA. This would help restore a measure of efficiency and fairness to TCPA litigation.

Respectfully submitted,

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Date: 7/9/18

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Exhibit A: Insights and AAPOR Member Comments

Insights Association Members

1. Carlos Garcia, Garcia Research (full letter)
[https://ecfsapi.fcc.gov/file/10620443614100/Garcia%20Research%20Comments%20to%20Insights%20and%20AAPOR%20Petition%20\(6.19.18\).pdf](https://ecfsapi.fcc.gov/file/10620443614100/Garcia%20Research%20Comments%20to%20Insights%20and%20AAPOR%20Petition%20(6.19.18).pdf)
2. Jordan Peugh, SSRS <https://www.fcc.gov/ecfs/filing/106160911026116>
3. Melissa J Herrmann, SSRS <https://www.fcc.gov/ecfs/filing/10622404724890>
4. Eran N. Ben-Porath, SSRS <https://www.fcc.gov/ecfs/filing/10622779931014>
5. David Dutwin, SSRS <https://www.fcc.gov/ecfs/filing/10619630706136>
6. Susan Sherr, SSRS <https://www.fcc.gov/ecfs/filing/106223077502168>
7. Deborah Winneberger, SSRS <https://www.fcc.gov/ecfs/filing/10621197767948>
8. Robyn Rapoport, SSRS <https://www.fcc.gov/ecfs/filing/10620796228771>
9. Jeb Bullis, Voxco <https://www.fcc.gov/ecfs/filing/10622384125636>
10. George Brezny, GB Marketing Research Solutions -
<https://www.fcc.gov/ecfs/filing/1062176629464>
11. Willy Kaplan, California Survey Research Services
<https://www.fcc.gov/ecfs/filing/1062028339659>
12. Andrew Richardson, Lucidity Research -
<https://www.fcc.gov/ecfs/filing/10621714414038>
13. Julie A. Davis, Xcel Energy - <https://www.fcc.gov/ecfs/filing/10621072425703>
14. David Lustig, Optimum Solutions Corporation/OSC World
<https://www.fcc.gov/ecfs/filing/10620028629788>
15. Crystal MacAllum, Westat <https://www.fcc.gov/ecfs/filing/10620910615131>
16. Shawn Herbig, IQS Research <https://www.fcc.gov/ecfs/filing/1062152490695>
17. Alan Appelbaum, Market Probe International
<https://www.fcc.gov/ecfs/filing/10620394621454>
18. Michael Halberstam, ISA <https://www.fcc.gov/ecfs/filing/10620139633001>
19. Mark Rosenkranz, Pacific Market Research
<https://www.fcc.gov/ecfs/filing/1061539581677>
20. David Stewart, Loyola Marymount University
<https://www.fcc.gov/ecfs/filing/10616235967838>
21. Jeff George, WBA Research <https://www.fcc.gov/ecfs/filing/10618852208159>
22. Lara Pow, SQM <https://www.fcc.gov/ecfs/filing/106180064016595>
23. Bob Davis, Davis Research <https://www.fcc.gov/ecfs/filing/10618269818414>
24. Joseph Harmon, Harmon Research Group
<https://www.fcc.gov/ecfs/filing/1061862709493>
25. Valerie Lykes, J.D. Power <https://www.fcc.gov/ecfs/filing/1061942307733>
26. Shirley Panek, Confrimit <https://www.fcc.gov/ecfs/filing/10620081181098>
27. Kim Dorazio, M. Davis and Company <https://www.fcc.gov/ecfs/filing/1062047119881>
28. Eric Jodts, Westat <https://www.fcc.gov/ecfs/filing/1062067529378>
29. Gary Langer, Langer Research Associates
<https://www.fcc.gov/ecfs/filing/106200834903052>
30. Christine Filer, Langer Research Associates
<https://www.fcc.gov/ecfs/filing/1062268504025>

31. Carol Haney, Qualtrics <https://www.fcc.gov/ecfs/filing/106201067100878>
32. Paul Nnanwobu, Random Dynamic Resources
<https://www.fcc.gov/ecfs/filing/106220064025990>
33. Ruth Bernstein, EMC Research <https://www.fcc.gov/ecfs/filing/10622167312734>
34. Jason Eric Saylor, MAXimum Research <https://www.fcc.gov/ecfs/filing/1062096722090>
35. Randa Bell, ASDE Survey Sampler <https://www.fcc.gov/ecfs/filing/10622079250198>
36. Ricki Jarmon, Abt Associates <https://www.fcc.gov/ecfs/filing/10622426818583>
37. Michael Link, Abt Associates <https://www.fcc.gov/ecfs/filing/10620071150139>
38. Stephanie Marken, Gallup <https://www.fcc.gov/ecfs/filing/106200666023018>
39. Ann Fouts, WSECU <https://www.fcc.gov/ecfs/filing/10621897304100>
40. Frances M Barlas, Gfk <https://www.fcc.gov/ecfs/filing/1062153650456>
41. Carla Lindemann, Issues & Answers Network
<https://www.fcc.gov/ecfs/filing/10621969623946>
42. Gregg Kennedy, Issues & Answers Network
<https://www.fcc.gov/ecfs/filing/10620347501924>
43. James Ratto, Survox <https://www.fcc.gov/ecfs/filing/10621224734339>
44. Larry Hooper, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/10621572715561>
45. William Kirk, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/106251367528039>
46. John Hunoval, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/106220655819690>
47. Ricardo Pereira, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/1062550043120>
48. George Djecki, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/106223076102446>
49. Kristy De Biasio, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/1062121222544>
50. Rob Cohen, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/10621208668441>
51. Warren Comunale, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/1062112204898>
52. John Wackerow, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/106221703613092>
53. Eric Hunter, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/10622037396736>
54. Amity Menard, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/10621960110237>
55. Thomas DeBiasio, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/1062150740502>
56. Marc Goulet, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/106210582201256>
57. JoAnn Kirk, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/10627999601147>
58. Althea Nicholas-Wood, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/10625759811427>

59. Gregg Peterson, University of Michigan Institute for Social Research
<https://www.fcc.gov/ecfs/filing/10621294186900>
60. Michael Brillantes, Russell Marketing Research
<https://www.fcc.gov/ecfs/filing/106212363713057>
61. Gerard Holzbaur, Marketing Systems Group
<https://www.fcc.gov/ecfs/filing/10620227020633>
62. Matt Hancock, Charter Oak Field Services -
<https://www.fcc.gov/ecfs/filing/1062517874547>
63. Mindy Rhindress, Queens College - <https://www.fcc.gov/ecfs/filing/10625160091309>
64. Carol Shea, Olivetree Research - <https://www.fcc.gov/ecfs/filing/1062573136200>
65. Patrice Wooldridge, Wooldridge Associates
<https://www.fcc.gov/ecfs/filing/10625797724388>
66. Susan Saurage-Altenloh, Saurage Research
<https://www.fcc.gov/ecfs/filing/10627485701734>
67. Jonathan Meyers, J.D. Power <https://www.fcc.gov/ecfs/filing/106222490209458>
68. Lance Hoffman, Opinion Access <https://www.fcc.gov/ecfs/filing/10622304378925>
69. Andrew Caporaso, Westat <https://www.fcc.gov/ecfs/filing/10622438526099>
70. Lee Quintanar, J.D. Power <https://www.fcc.gov/ecfs/filing/10622448622075>
71. Seth Brohinsky, Abt Associates <https://www.fcc.gov/ecfs/filing/1062257608358>
72. Jordan Klein, Abt Associates <https://www.fcc.gov/ecfs/filing/1062266402880>
73. Annie Weber, Gfk <https://www.fcc.gov/ecfs/filing/1062269789030>
74. Lynn Stalone, I/H/R <https://www.fcc.gov/ecfs/filing/1062272517917>
75. Andrea J Sedlak, Westat <https://www.fcc.gov/ecfs/filing/10622869518160>
76. Allen Porter, Survox <https://www.fcc.gov/ecfs/filing/1062297817732>
77. Allison De Jong, Langer Research Associates
<https://www.fcc.gov/ecfs/filing/10623145729753>
78. Angelique Uglow, ReconMR <https://www.fcc.gov/ecfs/filing/10623875623603>
79. Nancy Hernon, G3 Translate <https://www.fcc.gov/ecfs/filing/106251255920285>
80. Melissa Waetzman, RTi Research <https://www.fcc.gov/ecfs/filing/10625207616884>
81. Robert Lederer, RFL Communications
<https://www.fcc.gov/ecfs/filing/106252900724414>
82. Kim Adams, SNG Research Corporation
<https://www.fcc.gov/ecfs/filing/10625551516428>
83. Pam Kleese, Homesteaders Life Co. <https://www.fcc.gov/ecfs/filing/1062592388208>
84. Jesse Armitage, J.D. Power <https://www.fcc.gov/ecfs/filing/106212419311692>
85. Laura Bredenfoerder, BValley Communications and Market Research
<https://www.fcc.gov/ecfs/filing/106250751421562>
86. Andrew Teblum, Mars Research <https://www.fcc.gov/ecfs/filing/1062532911485>
87. Eric S. Levy, Research Now - SSI <https://www.fcc.gov/ecfs/filing/10625559816392>
88. Richard Worick, MSR Group <https://www.fcc.gov/ecfs/filing/1062599817472>
89. Connie Dey-Marcos, Credit Union National Association
<https://www.fcc.gov/ecfs/filing/10625194624027>
90. Terry Lawlor, Confirmit <https://www.fcc.gov/ecfs/filing/10625226469238>
91. Michael McGuire, McGuire Research Services
<https://www.fcc.gov/ecfs/filing/1062573303025>

92. Melissa Skogan, Assa Abloy Door Security
<https://www.fcc.gov/ecfs/filing/1062657285381>
93. Tara Hutton, Hilton <https://www.fcc.gov/ecfs/filing/10626027321207>
94. Brenda Cronin, DentaQuest <https://www.fcc.gov/ecfs/filing/10626144627875>
95. Judy Patton, Research Between the Lines
<https://www.fcc.gov/ecfs/filing/10626168108945>
96. Elizabeth Marie Herceg, National Association of REALTORS®
<https://www.fcc.gov/ecfs/filing/106263056500509>
97. Brian Jones, Chadwick Martin Bailey <https://www.fcc.gov/ecfs/filing/1062687675640>
98. Lynn Welsh, Olson Research Group <https://www.fcc.gov/ecfs/filing/1062676904852>
99. Tamara Kenworthy, On Point Strategies <https://www.fcc.gov/ecfs/filing/1062779826257>
100. Bob Graff, MarketVision Research <https://www.fcc.gov/ecfs/filing/10628059829216>
101. William Friedrich, M3 Global Research <https://www.fcc.gov/ecfs/filing/10628166429393>
102. Dave Rothstein, RTi Research <https://www.fcc.gov/ecfs/filing/106280940602032>
103. Michael Mermelstein, Nichols Research <https://www.fcc.gov/ecfs/filing/1062752986175>
104. Catlin McAteer, Connected Research & Consulting
<https://www.fcc.gov/ecfs/filing/10629226728789>
105. Michael Lloyd, Vectren <https://www.fcc.gov/ecfs/filing/10629265281468>
106. Marcie Berenson, Connected Research & Consulting
<https://www.fcc.gov/ecfs/filing/10629470522668>
107. Glenn Berenson, Connected Research & Consulting
<https://www.fcc.gov/ecfs/filing/10629542828441>
108. Wayne Marks, HANSA/GCR <https://www.fcc.gov/ecfs/filing/1062989492551>
109. Merrill Shugoll, Shugoll Research <https://www.fcc.gov/ecfs/filing/10626188345875>
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