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I welcome the proposed rulemaking under item 20, Limits on Number and Duration of Covered Calls. As I understand it, this would require collectors to transfer information about any do not call requests when the file is transferred to a new collector. I request that any rulemaking incorporate language to require that collectors particularly transfer information stating that the number has been reassigned. I also request that collectors be required to verify any claim that the number has been reassigned. This would avoid debtors claiming that a number had been reassigned when it had not. If the number has been reassigned, collectors should be barred from calling it again. I have had highly relevant experience with this.

A landline number was reassigned to my wife and myself in March of 2008. For six years, we received calls on this landline trying to contact the previous subscriber to collect a debt. The calls came from dozens of collection agencies and at least one attorney. We told each caller that the number had been reassigned. After a varying period, another company would call to collect, we believe, the same debt. We would repeat the same process. We would be rewarded with another similar call from another company. The calls only stopped when the New York State six-year statute of limitations tolled.

Now, there is no incentive at all for any collector to correct the file associated with any debt. It is cheaper for collectors simply to hang up and never correct the file. At the end of each collector's activity, the uncorrected file is simply sent to another collector. Then people like us get harassed again, to try to collect a debt we do not owe, incurred by people we do not know.

A statement in a prerecorded message, advising the recipient of the call to hang up if not the debtor, is insufficient. The collector simply calls back later.

The standard Telephone Consumer Protection Act statutory damages of at least \$500.00 per call should apply.

Many numbers are reassigned to new subscribers who have no connection to the old subscribers. Why should these new subscribers be harassed, often repeatedly, in order to reduce collectors' costs? The cost of correcting a file to indicate that a given number has been reassigned should be minimal. And collectors' costs might be reduced by calling fewer incorrect parties.

Yes, this places a burden on collectors. But if they learn that a given number has been reassigned, they have the chance to find debtors by other means. If they find the debtor, they may be paid.

The uninvolved third parties to whom these numbers have been reassigned now bear this burden instead. The burden is interruption of their lives, inconvenience and possible use of cell phone minutes. They are never paid.

Those who may benefit, should bear the burden.