

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20580**

In the Matter of

**Rules and Regulations Implementing the) CG Docket No. 02-
278
Telephone Consumer Protection Act of 1991) CC Docket No. 92-90**

NOTICE OF PROSPOSED RULEMAKING

COMMENTS OF

DIALAMERICA MARKETING, INC.

Arthur W. Conway
President & CEO
DialAmerica Marketing, Inc.
960 Macarthur Boulevard
Mahwah, New Jersey 07495
(201) 327-0200

December 9, 2002

FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Rules and Regulations Implementing the)	CG Docket No. 02-278
Telephone Consumer Protection Act of 1991)	CC Docket No. 92-90

SUMMARY

DialAmerica Marketing, Inc.’s (DialAmerica) comments focus on the telemarketing industry, particularly the outbound portion. The comments are based on DialAmerica’s long history as a leader in providing outbound telemarketing services.

There clearly are steps that can be taken to alleviate concerns that consumers have with regard to telemarketing. DialAmerica believes that elimination of “dead air”, a reasonable abandonment rate (5%), and delivery of Caller ID information would eliminate many of these concerns. These steps should be taken before any consideration is given to a national do-not-call list.

In Part I of our comments we focus on the effectiveness of the Telephone Consumer Protection Act (TCPA) Rule by addressing the following issues:

- (A) Company-specific do-not-call list – we think it works;
- (B) Predictive Dialers – 5% abandonment rate;
- (C) Caller ID – mandate delivery;
- (D) Required Disclosures – make to the appropriate consumer;

- (E) Tax-exempt Non-profit Organizations – For-profits calling on behalf of non-profits share the same exemption;
- (F) Established Business Relationship – a company-specific do-not-call request should supercede a prior relationship;
- (G) Safe Harbor – should remain in tact.

Part II concerns a national do-not-call list.

INTRODUCTION

DialAmerica, headquartered in Mahwah, New Jersey, is one of the largest outbound telemarketing service bureaus in the United States and employs more than 10,000 people nationwide in 54 locations. DialAmerica recently conducted a survey of its own work force with the following results: Twenty percent of the work force are single working mothers; twenty-six percent are students; minorities represent thirty-six percent; one percent are handicapped; and ten percent are participants in a “welfare to work” program. Like many other telemarketing service bureaus, DialAmerica provides employment to a wide variety of individuals, who might otherwise find it difficult to find employment, with the opportunity to earn a good wage while working in a positive environment with flexible work hours.

DialAmerica has been providing inbound and outbound telemarketing services for more than 45 years for a large number of clients in a variety of industries including banking, telecommunications,

cable, publishing, as well as other industries. We telemarket a wide range of products and services for these clients, and believe that these products and services offer significant value to the consuming public.

DialAmerica has built a reputation of integrity in the direct marketing industry. DialAmerica's executives have long been involved with major trade associations, and have been leaders in the development and promotion of higher ethical standards in the industry.

DialAmerica has been a model corporate citizen, devoting resources to community involvement and support to many nonprofit organizations. Through the DialAmerica "Sponsor Program", the company has contributed more than \$190 million to such organizations as Mothers Against Drunk Driving, The Leukemia and Lymphoma Society, various Special Olympic chapters, The National Children's Cancer Society, and many others. In each of the past ten years, DialAmerica has contributed over ten million dollars annually to charities in its Sponsor Program. In addition, over the past ten years, eleven million consumers participated by purchasing and paying for a magazine subscription through our Sponsor Program. Currently there are over six million active customers.

DialAmerica believes the impact of its Sponsor Program through monies contributed, as well as the public awareness created for these charities, has a significant positive social impact.

Over 400 magazines are represented in the Sponsor Program, including Time, Sports Illustrated, Reader's Digest, Better Homes and Gardens, and most other leading titles. Sales are for a subscription to one magazine payable in four installments and are offered at very good rates.

DialAmerica believes its Sponsor Program is one of the highest, if not the highest, quality agency sources of subscriptions for the magazine industry.

DialAmerica uses the most advanced telecommunications and data technology to maintain an efficient and effective operation. We design, build and use our own proprietary predictive dialing equipment. As a result, we consider ourselves to be experts in the intricacies of a predictive dialing environment.

DialAmerica conducts its business in a proper and ethical manner. When new laws, rules, or regulations governing telemarketing have been put into effect at the federal and state level, we find ourselves either already in compliance or exceeding the standards contained therein. DialAmerica believes it has an exemplary record at both the state and national level. We are unaware of any issues, either past or present, with the Federal Trade Commission (FTC) or the Federal Communications Commission (Commission).

PART I

COMMENTS REGARDING THE CURRENT TCPA RULE

A. COMPANY-SPECIFIC DO-NOT-CALL LISTS

DialAmerica firmly believes that the company-specific do-not-call approach works, and further, works very well. We base this

conclusion not on anecdotal information or pure speculation, as was much of the basis for the FTC Notice of Proposed Rulemaking (NPRM), but on an analysis of our own call history. Our approach on this will be to pose questions on the effectiveness of the company-specific do-not-call approach and to answer these questions based on our experience.

- Do consumers take advantage of the company-specific do-not-call approach by making such requests?

Yes, they do! DialAmerica has over 17.2 million such requests on its own suppression file. Of these, 13.9 million were as a result of calls that we made, and 3.3 million are on files supplied to us by clients. Of the 17.2 million requests, there are 13.4 million "unique" phone numbers, i.e., 13.4 million different consumers making such requests.

Additionally, we receive approximately 2.5 million company-specific requests on an annual basis. The magnitude of these numbers tells us that consumers do not find the company-specific do-not-call approach to be overly burdensome, and, in fact, take advantage of this approach.

- Do consumers accept calls from some companies but request not to be called by other companies?

Yes, they do! We first compared our calling history over the last five years to our 17.2 million company-specific file. We found that we made 7.1 million calls to consumers on our file (we called on behalf of companies other than the company for which the do-not-call request was originally made) that did not result in a request to be placed on a file (0.6 million did make such a request). We then compared all outbound sales made in the last five years (65.6 million) with the 17.2 million company-specific file. We found that 1.7 million sales were made to consumers on behalf of companies after these consumers had asked not to be called by another company. It is clear from this analysis that consumers willingly accept telemarketing calls from some companies (and even buy!) while preferring not to receive calls from other companies.

- Are consumers' requests to be put on a company-specific do-not-call list typically honored?

Yes, they are! We track instances of calls to consumers where consumers have indicated that they had previously made a request not to be called for a particular company. From 2000 to now, we had 8,341 such instances (presumably the request was made on a previous call by a company other than DialAmerica.) During the same time period, we made 286.6 million calls that resulted in a resolved lead (typically a sale or refusal.) As a percentage of calls made, such instances are 0.003 percent. If such requests were routinely not honored, we would expect to see a much larger

number of such instances. We believe this to be strong evidence that requests to be put on a company-specific list are typically honored.

Based on the empirical evidence set out above, DialAmerica asserts the company-specific do-not-call approach works very well. Furthermore, if it were not working, we could expect to see evidence of this in legal cases involving the do-not-call issue. However, our legal research turned up only eleven reported cases at the state and federal level involving do-not-call requests since 1992.

- Is a company-specific do-not-call approach burdensome to consumers?

The company-specific approach is not burdensome to the consumer. Since the telemarketing company initiates the contact by placing the outbound sales call, the consumer can simply make the request to be removed from a company call list at any point during the conversation.

If a national list were created and some consumers still wanted to be called by certain companies, they would need to take action to opt-in. Is this scenario not more burdensome than the former?

It is clearly easier for a consumer to opt-out rather than opt-in. The opt-out scenario provides consumers with a less burdensome way to choose from whom they want to receive telemarketing calls.

B. PREDICTIVE DIALERS

Predictive dialing really came into outbound telemarketing in the mid 1990's. It brought substantial efficiencies to the industry.

It also significantly increased reporting capabilities. Using this automation, every call has an electronic "trail." All calls can be accounted for. If a bad call is made, we can trace the call back to the sales representative that made the call much more readily than in a paper environment. With such tight accountability, quality improved.

The efficiencies of predictive dialing, along with lower long distance rates, brought down the cost of outbound telemarketing.

Outbound telemarketing became more affordable, and more marketing calls were made. The increase in the number of outbound calls is cited by many consumers in their comments to the FTC.

Predictive dialers are efficient because they "dial ahead." In a predictive dialing environment, more calls are placed by the predictive dialer than there are available sales representatives to receive calls. Algorithms are used to predict how many of the placed calls will be answered by consumers. It matches this prediction with the number of sales representatives available or predicted to become available when a call is answered. There is an error rate associated with this predictive process. If the number of calls answered by consumers is less than the number of sales representatives available, sales representatives will be idle, and hence, inefficient. On the other hand, if the number of placed calls answered by consumers is greater than the number of sales

representatives available, some calls will be abandoned or " placed on hold" (experience " dead air") for several seconds in the hope that a sales representative will become available to handle the call.

The algorithms used in predictive dialing can control the error rate of abandoned calls, i.e., the abandonment rate (AR). With a higher AR, it is more likely that a call answered by a consumer will be available when a sales representative becomes available than would be the case with a lower AR. As a result, a higher AR is more efficient from a telemarketer's viewpoint. However, there is a cost to a higher AR. That cost is measured in the level of consumer annoyance caused by consumers answering the phone only to find no one is on the other end of the line.

Abandoned calls can also be caused by individuals who call a friend, let the telephone ring four times, and thinking no one is home, hang up as the friend picks up the telephone to answer the call, only to hear a click, hence, an " abandoned call." We do not believe that abandoned calls, per se, are the cause of irritation to consumers. Rather, it is our position that the number of abandoned calls is what causes consumer frustration. DialAmerica also believes that, in the pursuit of efficiency, some members of the telemarketing industry have allowed ARs to exceed, and perhaps far exceed, the guideline of 5% set by the Direct Marketing Association (DMA).

DialAmerica believes the 5% guideline set by the DMA to be reasonable, fair, and allows for legitimate telemarketers the ability to conduct business in an efficient, ethical, and consumer-oriented manner. The average consumer receives 82 telemarketing calls a year (FTC Forum transcript June 6, 2002 page 92.) A 5% abandonment rate would mean the average consumer would receive four abandoned calls a year or one every three months. We do not believe this would show up on the consumer's "radar screen."

We believe the Commission should mandate a maximum abandonment rate of 5%. Additionally, there should be no "dead air" associated with the call. Abandon the call immediately rather than wait to see if a sales representative becomes available.

Many predictive dialers use answering machine detection (AMD). Dialamerica does not and has never used AMD. As noted in the Commission's NPRM on page 18, the Commission asked if restrictions on AMD should be implemented. DialAmerica feels strongly that the use of AMD to eliminate answering machines, or more perversely, to locate answering machines for the purpose of leaving a recorded message (which results in a 100% abandonment rate), should be banned completely.

C. CALLER ID

DialAmerica believes that Caller ID information should be sent with every telemarketing call. Such a requirement would create additional accountability in the telemarketing industry by providing a return address. We also cautioned that a substitution of a name and number instead of providing the local billing number would make tracking difficult. For those consumers who do not have Caller ID display ability, they simply need to press *69 to retrieve the calling party's number.

We currently deliver Caller ID information on all calls made in our Sponsor Magazine Program. Some consumers will call back to find out who called and the reason for the call (presumably those who did not take the call to begin with, i.e., "no answers".) Our experience is that consumers appreciate the opportunity that receiving Caller ID information provides to them (see attachment A for a more detailed discussion of how we do this.) This was also a common theme in the consumer comments to the FTC's NPRM issued on January 22, 2002. Many consumers were upset that no Caller ID information was delivered for telemarketing calls.

D. REQUIRED DISCLOSURES

The current identification requirements of the TCPA are sufficient and do not need to be changed. It would be an unreasonable expectation that telemarketers must provide the required disclosures in the circumstance of an abandoned call. DialAmerica strongly disagrees with the FTC's position that the consumer is

"receiving the call" when someone answers the telephone and that the telemarketer is violating the Telemarketing Sales Rule (TSR) should they fail to identify themselves when the predictive dialer abandons the call.

Required disclosures should only be made when the telemarketer has determined that the appropriate consumer is on the line. If a 5-year-old child answers the phone and the telemarketer makes all required disclosures prior to speaking with the parent, the telemarketer would be in compliance if the disclosures were not repeated to the parent. It would be more appropriate in this situation to ask to speak with a parent prior to making all required disclosures. DialAmerica believes that the average consumer would agree with this common sense approach for disclosure requirements.

E. TAX-EXEMPT NONPROFIT ORGANIZATIONS

DialAmerica strongly supports the exemption for calls made by or on behalf of nonprofit organizations and jointly by nonprofit and for-profit organizations. We feel it would be a tremendous financial burden on nonprofit organizations if their only option were to conduct a telemarketing campaign in-house. It is an unreasonable expectation that nonprofit organizations have the resources to conduct such a campaign. The most viable option is to "outsource" the calling to a for-profit company, which becomes an extension of

the nonprofit, therefore, sharing the same exemption.

DialAmerica's Sponsor Program is a commercial co-venture with nonprofits to help benefit these organizations. Our co-venture arrangement is very attractive for the nonprofit. There is no risk involved with our co-venture because the nonprofit incurs zero costs through this program. The amount that will be contributed to the nonprofit (12 ½%) is disclosed during the phone conversation unlike fundraising calls. The Sponsor Program is conducted on a continuous basis with consistent production results and monies given to the nonprofit. The primary distinction of our Sponsor Program is that there is absolutely no risk to the nonprofit. They simply wait for the check to arrive each month and endorse it. The same does not hold true for a professional fundraiser calling on behalf of the nonprofit.

As previously stated, DialAmerica has generated over \$190 million dollars through our commercial co-venture with the nonprofits (see attachment B.). Many of these nonprofits count on this support each year in order to continue and expand their services throughout the community. In many instances this program is their primary source of funding. In addition, our marketing efforts, whether they result in a sale or not, heighten community awareness and even generate additional, independent donations to the many organizations who participate in this program.

If a professional fundraiser is calling to generate donations for a nonprofit organization, isn't this the same thing as a for-profit company calling to offer a product where a portion of the proceeds benefits the nonprofit? Both of these calls are for the same purpose, to benefit the nonprofit.

DialAmerica believes the Commission should treat all calls for the purpose of benefiting a nonprofit

consistently. Calls made through our commercial co-venture should share in the same exemption as those seeking a monetary contribution.

F. ESTABLISHED BUSINESS RELATIONSHIP

DialAmerica believes that a request by a consumer to be placed on a company-specific do-not-call list should supercede any pre-existing business relationship. Such a request should take precedence, regardless of how a pre-existing business relationship is defined.

We honor such requests and believe it to be in the best interest of the consumer, our clients, and the telemarketing industry.

G. SAFE HARBOR

DialAmerica believes the Commission does **not** need to change the current provision permitting consumers to file suit in state court should he or she receive more than one telephone call within any 12-month period by or on behalf of the same company in violation of the guidelines for making telephone solicitations. Should the Commission make the modification and allow consumers to file suit for only one telephone call in violation of the TCPA, this would create an unnecessary burden for telemarketers.

Telemarketing companies that do not have the proper systems and measures in place to comply with the TCPA should be the focus of the Private Right of Action by consumers. We continually put forth a good faith effort to comply with the many Federal and State laws governing our industry. We believe that telemarketing companies should not be fined or forced to incur the legal expense of defending against a frivolous lawsuit as a result of a single error. The current safe harbor provision of the TCPA should remain intact.

PART II

NATIONAL DO-NOT-CALL LIST

DialAmerica strongly opposes a national do-not-call list. Such an all or nothing approach does not specifically address the concerns raised by consumers. Those consumers who do not sign up or have an established business relationship, will still be subject to the same annoyance factors that exist today. It is the Commission's stated desire to reach a fair balance between the consumer and the industry.

If the FTC's estimate of 60 million consumers signing up for the national do-not-call list (NPRM regarding TSR User Fees, footnote 3) is anywhere close to accurate, the universe of marketable names will be drastically reduced. We feel this will have a detrimental impact on the industry. Outbound telemarketing firms will see a significant decrease in revenue, and this would pose a real threat to their economic viability. Additionally, many other industries would be adversely affected

by such a list.

The telemarketing sales channel is very important to many companies. For example, it was the primary sales channel in the residential long-distance market when that market was deregulated back in the early 1980's. If such a list were in effect back then, it would be questionable how successful MCI and other long distance carriers would have been in attracting new residential long distance subscribers (obviously in this case there were no established business relationships.) It would also have given the incumbent, AT&T, a huge competitive advantage in that they could use the telemarketing sales channel for "win-back" programs.

The same holds true today in the deregulation of the energy industry. A local utility's deregulated energy marketing subsidiary would have a huge advantage over independent marketers in the local utility's area. The established business relationship exemption would allow the marketing subsidiary to use the telemarketing sales channel (which has proven to be very effective in marketing energy) while the independent marketer would be precluded from using it to a significant number of the utility's customers. In fact, we are aware of one situation in Georgia where the local marketing subsidiary used the telemarketing sales channel to sign up customers and also offered to put those same customers on the Georgia state do-not-call list precluding their competition from using the telemarketing sales channel to reach those same customers.

For many small businesses that use direct marketing as their primary source of sales, telemarketing represents the most viable channel. On a per prospect basis, the cost to telemarket is the same

whether you're calling few prospects or many prospects. Direct mail, on the other hand, has significant economies-to-scale such that the cost per prospect for a small campaign would be notably greater than it would be for a large campaign.

We feel that the establishment of a national do-not-call list and the resultant downsizing of the industry would lead to the loss of many jobs. It is estimated that more than 2.5 million people are employed in the outbound telemarketing industry (The DMA Report: Economic Impact – U.S. Direct & Interactive Marketing Today, 2000. Data from this analysis purchased from the DRI/WEFA Group.) Hundreds of thousands of jobs would be lost. Who would be affected by this loss of employment? A large percentage of our work force consists of single mothers, students, and “welfare to work” participants. These are every day people looking to make ends meet and the ones that will be punished because of the impact of a national list.

The FTC estimates the cost to establish and maintain a national do-not-call list at \$5 million for the first year (see FTC User Fee Notice, 67 Fed. Reg. 37362 at 37363 (2002)). If their estimate of 60 million people signing up is correct, they will be adding consumers to the list at a cost of less than 9 cents per consumer. If they can actually achieve this, they should be in the list processing business. We think the FTC has grossly underestimated the cost to establish the list. Additionally, we feel maintaining the accuracy of such a list will be very expensive. And, who's going to pay for this? By statute, the Commission cannot pass the cost on to the consumer. Therefore, the fiscal burden falls upon the telemarketer.

Legitimate telemarketers will not only be impacted by the loss of callables, but also by the cost they will incur to pay for a national do-not-call list. Those in our industry complying with current rules and regulations would be penalized for those who disregard them. Does this meet the stated desire of the Commission to be fair and balanced?

Finally, if the specific problems inherent in outbound telemarketing today are not satisfactorily addressed, practically every consumer could eventually be on the national do-not-call list. Presumably only those consumers who like to be hung up upon and like to hear “dead air” when they answer the phone will not be on the list. It is DialAmerica’s contention that if these problems were adequately addressed, there would be no reason to consider a national do-not-call list. As noted in Part I, DialAmerica strongly believes that the company-specific do-not-call approach works and can work better. This gives the consumer adequate opportunity to reduce the number of unwanted calls they receive.

CONCLUSION

What has changed in the telemarketing industry since 1992?

1. Long distance rates have dropped by 75%.
2. Predictive dialers have become common in outbound telemarketing.
3. Answering Machine Detection was developed.

These three changes have had a significant impact on the telemarketing industry.

The cost to conduct a telemarketing campaign is the same or even less today than would be the case if the same campaign were conducted 10 years ago. On the other hand, the cost of direct mail has increased significantly due to the increased postal rates, paper costs, and printing. Relatively speaking, telemarketing is much more cost efficient as a direct marketing channel than it was 10 years ago. As a result, much more telemarketing is done today than was done back in 1992.

Although the industry has achieved great efficiencies with the use of predictive dialers, particularly those employing AMD, DialAmerica concedes there has been an increase in consumer annoyance as evidenced by the number of consumers that have signed up on the State lists and the DMA Telephone Preference Service. The shrinking of the universe is the real cost to the telemarketing industry.

We believe reasonable steps can be taken to specifically address the problems that caused increased consumer annoyance. We have outlined these in Part I, including banning AMD and a national 5% abandonment rate. Again, as pointed out in Part I, these solutions are viable if delivery of Caller ID information were mandated by the Commission. If the Commission chooses not to mandate the delivery of Caller ID information on all telemarketing calls, perhaps the Commission should consider an outright ban on the use of predictive dialers across the board. Alternatively, only allow the use of predictive dialers in cases where Caller ID information is delivered.

ATTACHMENT A

Calling Party Number Availability:

DialAmerica has been delivering the Calling Party Number (CPN) for over two years using regular T-1 trunk groups provisioned by AT&T.

To date we have only utilized AT&T Digital Link service to deliver CPN, but it is our understanding that MCI, Qwest, and Sprint also provide similar CPN capability.

All carriers offer Integrated Services Digital Network (ISDN) T-1's, also known as Primary Rate Interface (PRI), which enables the user to control whether CPN is delivered, and what telephone number is displayed.

The limitation using AT&T Digital Link T-1's to deliver CPN is that AT&T will only allow us to display the CPN that is associated with the branch location that originates the phone call. We cannot deliver a number from a different DialAmerica location or deliver a toll-free number. The CPN service offering from Qwest using standard T-1's allows the CPN to be a toll-free number owned by the calling company, but not necessarily linked to the location that originates the call. We plan on testing the Qwest service next quarter.

How DialAmerica Delivers CPN Today:

As an AT&T Digital Link customer we have the option to provision our regular outbound T-1 trunk group with CPN presentation allowed, or restricted. If the presentation is allowed we will deliver a phone number, which identifies the DialAmerica location generating the outbound call. By delivering the number we are allowing the called party to capture our number on their Caller ID equipment, or utilize the *69 feature to identify the phone number that called their home.

If a consumer decides to call us back, we utilize the Local Exchange Carrier (LEC) call forward service to route the calls to our Customer Service Center located in Athens, Ga. The caller is routed into a voice response unit (VRU) that explains that DialAmerica Marketing attempted to contact them for a particular program, and that we will attempt to contact them again in the next few days. We also provide a toll free number if the caller would like to speak to a customer service representative.

Listed below is a report showing the calls to our customer service department for the past six months as a result of displaying caller ID.

168,198	-	Total Calls to VRU
11,268	-	Total call backs to customer service

Reasons for callbacks:

43	-	Billing Inquiry
169	-	Request to cancel order
217	-	Change of address request
116	-	Checking satus of order
531	-	Called to place a magazine order
78	-	Called to make payment
1447	-	Refused offer at this time
4131	-	Miscellaneous inquiry
		4536 - Delist

request

Based on the total calls to the VRU (168,198) only 11,268 (7%) of the consumers exercised the option to call back. The remaining 93% were satisfied with the VRU message as to why we were calling. This process clearly gives the consumer the "power" to make an educated decision concerning the calls they receive.

ATTACHMENT B

DIAL AMERICA MARKETING, INC.
SPONSOR MILESTONES
 PROJECTED SPONSOR EARNINGS AS OF DECEMBER 2002

THE LEUKEMIA & LYMPHOMA SOCIETY	\$25,600,000
BIG BROTHERS/BIG SISTERS	19,600,000
MOTHERS AGAINST DRUNK DRIVING	16,500,000
MD ANDERSON CANCER CENTER	4,300,000
DOERNBECHER CHILDREN'S HOSPITAL	2,500,000
NAT'L ALLIANCE BREAST CANCER ORGS.	600,000
NAT'L CHILDREN'S CANCER SOCIETY	500,000
MISC	5,400,000

SUBTOTAL \$75,000,000

SPECIAL OLYMPICS

	MILLION		MILLION
PENNSYLVANIA	\$6.8	MINNESOTA	2.7
OHIO	6.7	WASHINGTON	2.6
NEW YORK	5.4	TENNESSEE	2.4
MASSACHUSETTS	5.1	CONNECTICUT	2.2
ILLINOIS	4.7	MISSOURI	2.2
CALIFORNIA	4.6	ALABAMA	1.7
NEW JERSEY	4.5	IOWA	1.5
MICHIGAN	4.4	KENTUCKY	1.5
WISCONSIN	4.3	LOUISIANA	1.5
NORTH CAROLINA	3.6	COLORADO	1.4
TEXAS	3.3	NEW HAMPSHIRE	1.4
VIRGINIA	3.2	SOUTH CAROLINA	1.4
MARYLAND	3.0	WEST VIRGINIA	1.4
GEORGIA	2.8	MAINE	1.3
FLORIDA	2.7	UTAH	1.2
INDIANA	2.7	KANSAS	1.1
		MISC	9.9

SUBTOTAL \$105,200,000

POLICE ATHLETIC LEAGUES

	MILLION		MILLION
NEW YORK	\$5.1	CLEVELAND	1.3
DETROIT	1.9	SUFFOLK COUNTY	1.3
		MISC	5.2

SUBTOTAL \$14,800,000

Total for all Sponsors.....

\$195,000,000