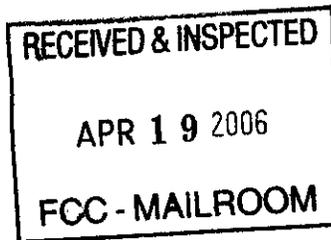


PROGRESSIVE
FINANCIAL SERVICES INC



April 10, 2006

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: CG Docket No. 02-278

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As you know, the Telephone Consumer Protection Act (TCPA) was passed in 1991. This law was designed to protect consumers from invasive calls from telemarketers. One of the provisions of the TCPA prohibits the use of an autodialer to communicate with a consumer by way of their cell phone.¹ Between 1991 and 2003, the FCC consistently ruled that this autodialer prohibition did not apply to calls made using an autodialer *if the sole purpose of the calls was to recover payments for goods and services already purchased.*

But in July 2003, the FCC took a dramatic shift in its position about the applicability of the autodialer prohibition to the credit and collection industry when it expanded the statutory definition of autodialer to include predictive dialers. By expanding the definition of autodialer and failing to restate the commission's prior rulings that calls made by creditors and debt collectors to consumers' about their past due payment obligations by way of their cell phones were not subject to the autodialer prohibition, the FCC inadvertently brought calls my company makes for the sole purpose of recovering past due payment obligations from consumers within the scope of the regulation. This shift in policy has caused my business substantial harm. We recently spent over \$300,000.00 purchasing a new auto dialer to assist in collecting defaulted Student Loan account for the United States Department of Education. If we are not able to use this equipment in our collections efforts it will directly impact the amount of money we are able to return to the US Department of Education, and by extension the amount of money

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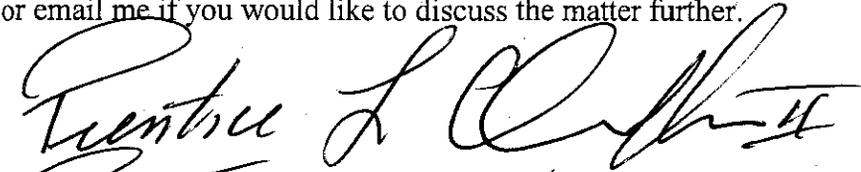
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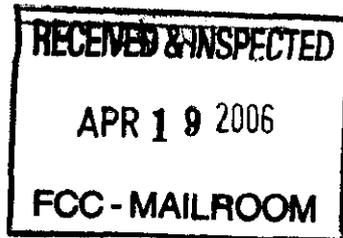
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TRENTICE L. CHANDLER II

cc: ACA International

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FINANCIAL SERVICES INC



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Sincerely,

cc: ACA International

A handwritten signature in cursive script, reading "Lloyd Clay". The signature is written in black ink and includes a long horizontal flourish extending to the right.

PROGRESSIVE
FINANCIAL SERVICES INC

RECEIVED & INSPECTED

APR 19 2006

FCC - MAILROOM

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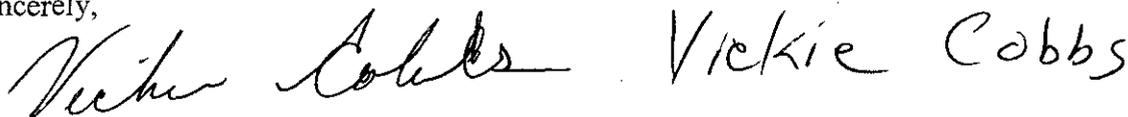
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Sincerely,

 Vickie Cobbs

cc: ACA International

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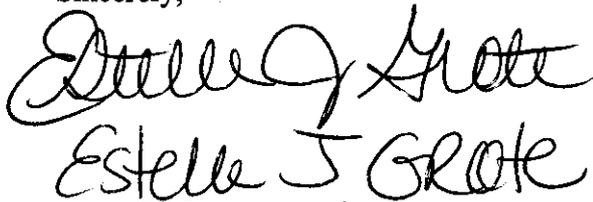
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Sincerely,

A handwritten signature in cursive script that reads "Estelle J. Grote". The signature is written in black ink and is positioned above the printed name.

cc: ACA International

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RECEIVED & INSPECTED

APR 19 2006

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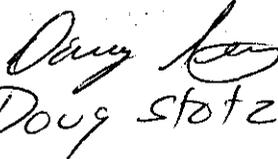
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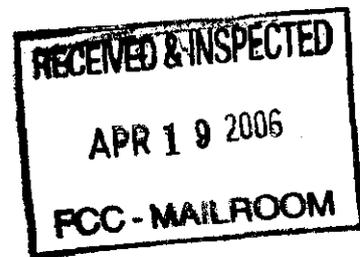
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Sincerely,

A handwritten signature in cursive script that reads "Bernicea Jackson". The signature is fluid and extends to the right with a long, sweeping tail.

Bernicea Jackson

cc: ACA International

PROGRESSIVE
FINANCIAL SERVICES INC

RECEIVED & INSPECTED
APR 19 2006
FCC - MAILROOM

April 10, 2006

Chairman Kevin J. Martin
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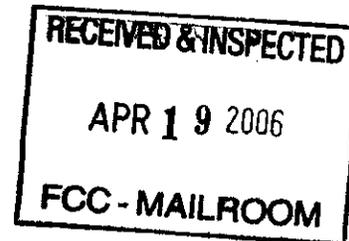
Sincerely,

Debra Peterson

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cc: ACA International

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FINANCIAL SERVICES INC



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Jodi Borns



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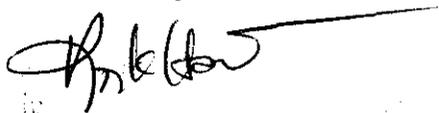
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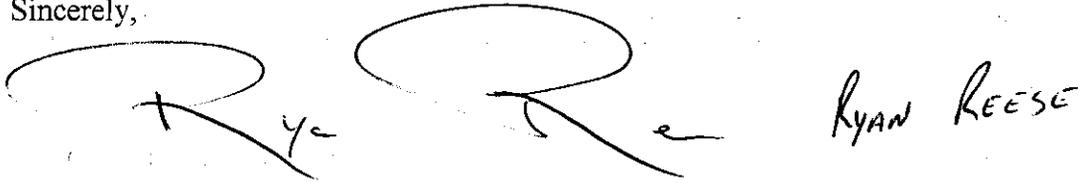
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cc: ACA International