



**NATIONAL ASSOCIATION
OF REALTORS®**

The Voice for Real Estate®

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REGULATORY & INDUSTRY
RELATIONS

Joseph M. Ventrone

*Vice President, Regulatory Affairs and
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January 14, 2008

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CG Docket No. 02-278; FCC Number 07-203

Dear Federal Communications Commission,

The National Association of REALTORS® (NAR) appreciates this opportunity to comment on the proposed rule of the Federal Communications Commission (FCC) to amend the FCC rules under the Telephone Consumer Protection Act (TCPA). The proposed rule requires telemarketers to honor registrations with the National Do-Not-Call Registry indefinitely so that registrations will not automatically expire based on the five year registration period.

On behalf of the 1.3 million members of the National Association of Realtors® who must comply with the FCC rules under the TCPA, I ask you to consider the continuing economic burden that the proposed rule imposes on small businesses. NAR is concerned that eliminating the five year registration period will make it more difficult for the FCC to achieve its goal of maintaining a high level of accuracy of the list. Under the proposed rule, all telephone numbers on the registry will remain indefinitely and therefore, all invalid numbers not properly scrubbed from the list will also remain on the list indefinitely. No longer will the existing five year period automatically scrub the list of numbers that have changed hands, been disconnected or have been reassigned.

The proposed rule may impose a disproportionate economic burden on small businesses unless the FCC can ensure the effective and efficient use of technology to eliminate all telephone numbers no longer belonging to original Do Not Call registrants. The existing economic and administrative burdens of TCPA compliance imposed on small entities with limited resources are already significant. NAR urges the FCC to work to ensure that any changes to the TCPA will not increase these burdens and to research and study the merits of appropriate regulatory changes and exemptions to TCPA for small businesses in the future.

Thank you for the opportunity to comment on this very important issue. If you have any questions or concerns, please do not hesitate to contact Scott Rinn at (202) 383-7508, srinn@realtors.org.

Sincerely,

Joseph Ventrone
Vice President, Regulatory Affairs and
Real Estate Services

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