

I am briefly commenting on the Petition for Expedited Clarification and Declaratory Ruling filed by Global Tel*Link Corporation (GTL).

I agree with the well-reasoned comments filed by Gerald Roylance in this matter.

The types of call that GTL asks immunity for are exactly the types of call that the TCPA was enacted to prevent. They are plain and simple advertisements for services provided by GTL.

The exception that GTL asks for amounts to being able to use telephone subscriber prospect lists provided by prison inmates without the need for GTL to scrub the lists against the NDCL and their own company specific list nor to obtain the subscriber's prior express permission or invitation.

I urge the Commission to DENY this petition.