



April 17, 2004

Federal Trade Commission/Office of the Secretary
Room 159-H
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580



Re: CAN-SPAM Act Rulemaking, Project No. R411008

To the Commissioners,

Thank you for trying to reduce the problem of unsolicited bulk email, but I am afraid that some of the requirements will spell disaster for my business, as well as any other businesses who derive a large percentage of their income from their online efforts.

As an IT, computer and technical professional with experience dating back to the 1970's, I can tell you that there is a need to carefully weigh all of the details, and that disastrous problems will most likely result from any simplistic "solution".

If the use, implementation and management of suppression lists is required of small businesses, I believe that many legitimate small businesses will simply go out of business.

Having provided IT solutions for many small businesses in the Central Indiana area, I know firsthand that the technical details of keeping such lists up to date is far beyond the skills of most business owners and professionals.

Personally, I feel that the effectiveness of the CAN-SPAM Act will have much the same effect as banning guns to stop criminals from using them, namely "little to none".

Part of the problem with using such suppression lists lies with consumers themselves. It is a common occurrence to have a customer ask to be removed from "Company A's" list for "Widget 1" this week, only to have the same customer ask for more information about "Widget 1", or "Widget 2" from "Company A" next week as a result of new information or a personal referral from a friend.

It's called advertising, and the changing needs and wants of customers.

The teenage "girl" might ask to be removed from a list that advertises "baby items", until she decides to start a family of her own. If she has been "banned" from a list, it may be

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very difficult to get the information that she now needs.

Frankly, I believe that there are better technical solutions available, and I have put together a comprehensive one myself, if anyone is interested in reviewing it.

Sincerely,



Ralph Moore

[REDACTED]
Indianapolis, IN
[REDACTED]
[REDACTED]

P.S. I lock my door and only allow those that I know to enter. It makes more sense to me than letting everyone in and then throwing out the people who shouldn't be there. I think we should do that with email, too! Don't you?