

**CAN-SPAM Act Rulemaking, Project No. R411008**

To the Commissioners,

Unsolicited bulk email is a problem, and I thank you for taking action. However, I am concerned about the proposed requirement for merchants to maintain suppression lists.

There is a huge difference between honest marketers and those who use unsolicited and untargeted bulk email, which is the real problem.

There are so many problems and costs associated with this idea, and so much damage done to consumers and businesses alike, that I feel I must urge you to consider this matter most carefully.

Not all marketing online is unsolicited bulk email. The people you should go after are the pornographers and viagra pimps.

Requirement of the use of suppression lists will seriously damage many of the legitimate publications available on the net, such as the one's I use to provide for my family in a fair and equitable way.

My specific concern is for harm to publishers who require permission from the consumer prior to adding them to any list.

They're not who CAN-SPAM was designed to put out of business, but this requirement will very likely have that effect.

There's also the potential for significant harm to consumers, because of the problem of properly knowing their intent when they unsubscribe from a list. On top of that, these suppression lists could easily fall into the hands of spammers, leading to more spam instead of less.

The intention and wording of the law must be clear to exclude honest and legitimate marketers, and target the people who use untargeted and unsolicited bulk email to people who never wanted this information in the first place.

The act of having a valid removal link should be sufficient to provide this distinction.

I am also concerned about offering incentives to turn in spammers. While this may appear a good solution, I'm afraid that it may result in a lot of false complaints by people who want to profit by causing problems for honest marketers. In other words, a group of "professional scammers" will open up and start making money in a very unethical way.

I was quite shocked at the potential problems this ruling could involve, and urge you in the strongest possible terms to reconsider its implementation in light of these problems,