



March 14, 2002

Office of the Secretary
Federal Trade Commission
Room **159**
600 Pennsylvania Avenue, **N.W.**
Washington, DC **20580**

Dear **Sir** or **Madam**:

FireCo, LLC. is an outbound telemarketing service working on behalf of local **and** statewide Fire Fighter organizations in **10** states. The membership organizations we represent are part of the heroes of today's America. They come to FireCo to assist them in raising additional funds to support their member benefits and various community service projects. We accomplish **this** by placing telephone calls to the general public on behalf of the Fire Fighter organizations to promote entertainment events.

As a telemarketing service bureau raising **funds** for nonprofit organizations, FireCo is required to be registered in every state we work. We have never been the subject of any kind of regulatory action in the jurisdictions we work. We also subscribe to state do-not-call lists. In addition, we maintain **our** own private database of citizens that have requested not to receive phone calls from the Fire Fighter organizations we represent. **Our** clients insist on it. However, we rarely receive a request from someone who does not wish to be called in the future. We take **great** initiative in having **a** professional, well disciplined, **and** well-trained cadre of telemarketers. We pride ourselves in the many outstanding programs that the Fire Fighter organizations we represent are able to accomplish due largely in part to the moneys we raise on their behalf.

It is my understanding from the proposed amendments to the Telemarketing Sale Rule that we will no longer be able to contact long-time repeat supporters on behalf of our Fire Fighter clients once these supporters sign up to be placed on a national do-not-call registry. A large number of the people we contact on behalf of **our** Fire Fighter nonprofit clients are repeat supporters. We believe that any such registry, if put into effect, could generate **as** much **as** a 30% response, thereby equally reducing the amount of funds we will be able to raise for **our** client Fire Fighter organizations. Not **only** will it cost the Fire Fighter organizations, but it will **also** cost the jobs of a number of **our** employees. I further understand that if a supporter of a Fire Fighter organization places his/her name on the registry, **we** will have **to go to** them and obtain their consent in writing **to** re-activate them. That is unduly harsh, expensive **and** impractical.

It has been explained to me that not all calls will be subject to *this* proposed amendment. Politicians, credit card companies, and long distance service providers (which we believe to be the true source of most complaints against telemarketers) will not be affected. It is my opinion that citizens will sign up on the do-not-call registry to avoid being called by the very same companies that will not be affected, not to avoid calls for support from the Fire Fighter organizations. I am writing to you because we are opposed to any kind of national do-not-call registry that is so unevenly applied. I hope you will rethink this proposal, and in the event it does go forward, please consider amending it to exclude all calls made on behalf of all nonprofit organizations.

Very truly yours,

A handwritten signature in black ink that reads "Frank D. Stephens". The signature is written in a cursive style with a large, sweeping "F" and "S".

Frank D. Stephens
Chief Manager
FireCo, L.L.C.