

HICKORY FIREFIGHTERS ASSOCIATION

INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS LOCAL 2653

637 Main Avenue SW • Hickory, NC 28602

Firefighters, There When You Need Them



March 21, 2002

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

Dear Sir/Madam:

I **am** writing to you on **behalf of** the Hickory Firefighters Association, International Association of Firefighters Local #2653. **As** President of the local, I want to express **our** objections to the Federal Trade Commission's proposal to amend the Telemarketing Sales Rule. The proposed application of a national "do not call" registry **to our** organization is unfair, unwise and unworkable.

As firefighters, we make it **our** business to serve **our** communities to the greatest extent possible. **Our** firefighters organization is a non-profit entity that relies extensively upon **small** gifts from a large number of people to support numerous charitable activities. Through such contributions, we have been able to send **our** Mobil Smokehouse to the majority of elementary schools, hospital events, and Salvation Army locations in **our** county. **Our** Mobil Smokehouse is tool we use to teach children and adults fire safety. Each year we have more and more people, schools, churches, and civic groups ask us to bring the smokehouse to their locale. Without the contributions we receive it would be impossible to pay for the numerous expenses such **as** fuel, maintenance, tires and **a** tow vehicle. We charge nothing for bringing the smokehouse!

The proposed rule is unfair because it would create **a** "do not call" registry maintained by the federal government that would apply to fundraising calls made on behalf of our organization to support **our** charitable activities, but would not apply to politicians' fundraising calls or phone solicitations by **banks**, telephone companies and insurance companies. Beyond being **unfair**, this simply does not make any sense.

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The proposed rule is unwise because it would prohibit **our** organization from contacting individuals on the “do not call” list even if they had consistently donated to **our** organization in **the** past and would still like to do so in the future. At a time when government is relying upon non-profits and charities to do more, it should not undermine the ability of organizations such **as our** own to provide valuable services **to** the public.

Finally, the proposed rule is unworkable because it violates **our** First Amendment right to contact members of the public. The Supreme Court **has** consistently held that any limitations on free speech must be narrowly drawn and use the least intrusive means. This rule satisfies neither of these requirements and further violates the Constitution because it favors calls **from** commercial interests, such **as** banks and insurance companies, over calls made on behalf of non-profits.

Please consider this amendment in light of these concerns, and reject the proposal to apply the “do not call” registry to calls made on **behalf of** non-profit organizations.

Sincerely,

Bill Denton

President

Hickory Firefighters Association

I.A.F.F. Local #2653