

Direct Mail Express, Inc.
Public Comments related to
TSR Prerecorded Call Prohibition and Call Abandonment Standard Modification,
Project No. R411001

In the FTC's TSR Prerecorded Call Prohibition and Call Abandonment Standard Modification, Project No. R411001 one of the central issues is the limitation of pre-recorded "telemarketing calls". These calls are defined by the FTC as calls which are part of a "plan, program or campaign which is conducted to induce the purchase of goods or services or a charitable contribution." While our company agrees that the use of pre-recorded telemarketing calls needs to be limited in order to avoid abuse by unethical telemarketing companies; however, one concern exists.

The current TSR Prerecorded Call Prohibition and Call Abandonment Standard Modification, Project No. R411001 does not clearly address whether Interactive Voice Response (IVR) calls are considered pre-recorded calls under this Project. It is DME's position that IVR calls should not be classified as pre-recorded calls for many reasons, such as:

- IVR calls are interactive and allow the consumer to respond to any questions asked. The consumer is not forced to listen and do nothing as is the case with pre-recorded calls.
- IVR calls have fast response times preventing the "dead air" that often occurs in pre-recorded messages. These calls do not leave the consumer waiting for an answer on the other end of the line. In the event the customer is confused, IVR calls allow the consumer to press a pre-defined key (such as "0") to speak to a live operator.
- IVR calls have been successfully used for years for many different important tasks such as reminding consumers to pick up/renew prescriptions. The use of automated systems allows companies to perform these services in a cost effective manner. The result is that consumers are kept informed of important information and prices are kept down in many different industries.

Our company applauds and supports the efforts of the FTC to insure consumers are protected from over zealous and/or unethical telemarketing practices. We believe the comments above will help in making TSR Prerecorded Call Prohibition and Call Abandonment Standard Modification, Project No. R411001 more applicable and effective in the telemarketing industry.

Respectfully,
Direct Mail Express, Inc.