

April 1, 2002

To: tsr@ftc.gov

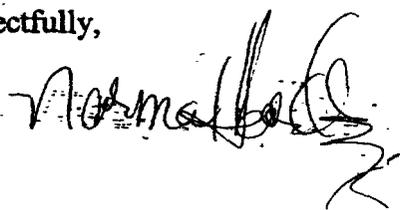
From: Telemarketing Rulemaking - Comment, FTC file number R411001

As an employee of Household's **consumer** lending business (HFC/Beneficial), I am opposing the **FTC's** proposed changes to the Telemarketing Sales Rule (**TSR**) for the following reasons:

1. I work for a financial services company that employs more than 30,000 people in this **country**. The ability to **reach** our customers is critical to **our** ability to conduct **business**. Passage of **this** new rule may have a negative impact on my job as well as other **jobs** in my company.
2. Household offers **much** needed credit to millions of consumers in the **United States** at reasonable prices. However, every **additional** regulatory **burden** raises the **cost** of **credit to our customers** and their families.
3. **While** the concept of a **national** "do not *call*" list is a **good idea**, the proposed changes layer a **national** list onto a patchwork of **state** lists and **requirements**. A more effective answer—for both consumers and **businesses**—**is** to **create** a "master" list, perhaps led by the FTC. Otherwise, you are simply **creating** a potential fifty-first state **list** and massive confusion.
4. The proposal to **create** a **national** list is vague and undeveloped. For example, **who** will fund the **list**? Who will **have access** to it? Will a telephone **number** or name drive it? What will **ensure** that the **list** will **only** be used for the purpose for which it is **intended**?
5. Numerous other problems exist **that** would severely impact Household's ability to conduct **business**. In particular, the provision that would force us to **treat inbound** calls the same as outbound calls, would **severely** limit **our** ability to offer valuable products and services to our **own customers**.

I am urging the **FTC to withdraw** the proposal in its **current form**. While well **intentioned**, the **proposed** changes are vague to the point of unenforceability. If passed in its current **form**, it will **unnecessarily raise** the cost of products and services that **our** customers depend on, and it could impact hundreds of **thousands** of **jobs** throughout the financial services industry.

Respectfully,



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