



Southeastern Society of American Foresters

Representing the Forestry Profession in Alabama, Florida and Georgia

P.O. Box 2945 ♦ LaGrange, GA 30241 ♦ (706) 845-9
FAX (706) 883-8215



Chair
Charles Maynard
65 Blue Heron Point
Havana, FL 32333
Phone: 850-414-0843
Fax: 850-488-0863
Email: Maynardc@doacs.state.fl.us

Chair-Elect
William L. Consoletti, CF
3650 Ginger Drive
Columbus, GA 31909
Phone: 334-448-6345
Fax: 334-448-6476
Email: wlc2@meadwestvaco.com

Secretary
Charlie Houder
5518 NW 45th Lane
Gainesville, FL 32606
Phone: 386-362-1001
Fax: 386-362-1056
Email: chouder@treeware.com

Treasurer
William C. Rogers, CF
10044 Buck Point Road
Tallahassee, FL 32312
Phone: 850-893-4194
Fax: 706-575-8176
Email: brogers@nettally.com

Past-Chair
Joe D. Roberson
P.O. Box 2424
Opelika, AL 36803-2424
Phone: 334-448-6364
Fax: 334-745-5742
Email: jdr1@meadwestvaco.com

Alabama Division - Chair
Ronald L. Laechelt (Lee)
Box 104
Helena, AL 35080
Phone: 205-987-8811
Fax: 205-987-9824
Email: rleel@aol.com

Florida Division - Chair
Wayne Smith
University of Florida
P.O. Box 697
Gainesville, FL 32606-0697
Phone: 352-846-0850
Fax: 352-392-1707
Email: whsmith@ifas.ufl.edu

Georgia Division - Chair
Scott Jones
15 Flint Ridge Drive
Mableton, GA 30126
Phone: 404-316-1445
Fax: 404-316-5963
Email: sjones@forestlandowners.com

Business Manager
Charles T. Hall, Jr.
P.O. Box 2945
LaGrange, GA 30241
Phone: 706-845-9085
Fax: 706-883-8215
Email: chall@asginfo.net

April 16, 2004

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

000810

RE: CAN-SPAM Act Rulemaking, Project No. R411008, addressing the definition and implementation of the Act as set forth in sections 3(2)c and 3(17)(B).

On behalf of the Southeastern Society of American Foresters we wish to express our support and endorsement of the comments previously submitted by the International Association of Association Management Companies, regarding the proposed rulemaking. <http://www.iaamc.org/IRS/index.html>

To summarize those comments, the Southeastern Society of American Foresters urges the Commission to clarify that the definition of "commercial electronic mail messages" is directed at regulating activity that primarily furthers the commercial endeavors of taxable for-profit businesses. In this regard, the regulations implementing the Act should specifically provide that the email communications of tax-exempt nonprofit organizations that are consistent with their tax exempt nonprofit purpose are by definition not primarily commercial and therefore do not fall within the definition of regulated commercial electronic mail messages.

Additionally, the regulations should clarify that even where email communications from tax exempt nonprofit organizations sent to current members and/or donors are primarily commercial and not related to the organization's tax exempt nonprofit purposes, they should be excluded from the CEM definition as transactional or relationship messages because such communications are primarily intended to provide information in connection with an organization or association membership and/or deliver goods and services under the terms of an existing member or donor relationship.

Sincerely,

Charles T. Hall, Jr.
Business Manager