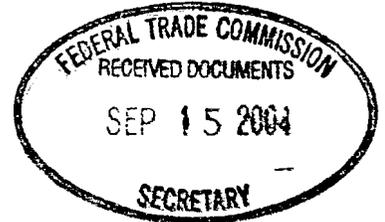


Setting the Standard for Service, Quality, and Excellence.

September 8, 2004



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

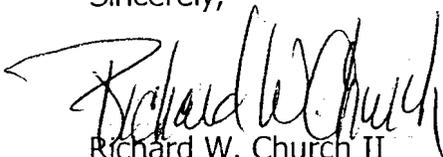
Re: *American Society of Association Executives/ CAN-SPAM Act Rulemaking, Project No. R411008 addressing the definition and implementation of the Act as set forth in sections 3(2)c and 3(17)(B).*

I write on behalf of the members of the International Association of Association Management Companies. (IAAMC) Our 180 association management company members manage over 2,000 associations with annual combined budgets exceeding \$1 billion.

Earlier this year we wrote to explain that the tax-exempt nonprofit organizations we manage exist to serve their members and constituencies who seek out membership and/or involvement in the organization. To assist individuals and others in achieving their goals, tax-exempt nonprofit organizations continuously strive to offer a variety of messages. Email has become the preferred vehicle to deliver these messages.

For this reason we believe the proposed CAN-SPAM Act rule, issued on August 13, would create an unfair regulatory burden on such communication with our members. We reiterate our request that the Commission's rule-making expressly provide that email transmitted by a tax-exempt nonprofit organization, primarily related to one or more of the organization's duly authorized tax exempt nonprofit purposes, not be considered commercial electronic mail messages under the Act and, therefore, be specifically exempt from regulation under the Act.

Sincerely,


Richard W. Church II
President

