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I'm very concerned about the proposal to significantly increase access fees for the national DNC registry. The burden of this fee increase will be carried by law abiding firms that are already paying their "fair share." This runs counter to the FTC's stated concern in the original rulemaking proposal.

The FTC estimated that 10,000 firms would pay for access, yet indicates that only 6,000 firms have paid registration fees. The root problem is not just lower fee income than projection, but why have so many fewer firms than anticipated register? It would be appropriate for the FTC to investigate possible lack of compliance before adding financial burden to firms which are complying.

Further, while firms that use telemarketing may be the politically easy target for bearing this burden, this is not good public policy. Rather it is consumers that are the direct beneficiaries of the DNC registry and it is unclear how -- if at all -- the beneficiaries are paying the price.

It would be an unwieldy burden on the FTC to collect fees from the millions of consumers which have registered. Since the DNC registry service is deemed to be a public good, than the public should bear some direct burden. A minimal tax can be placed on all phone lines, such as 911 fees or universal access fees, as a routine part of the monthly cost.

While the FTC may be very sensitive to public and political pressures, it is unjust to place an expensive and burdensome restriction on a legal industry. Enforcement of existing fee applications or efforts at expense reduction should come before steps to increase revenue.