

Office of the Secretary
Room 159
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
March 27, 2002

I am writing in regards to the proposed new regulations and guidelines that will affect telemarketing. If approved, these new regulations and guidelines will have a tremendous impact on the cost of telemarketing and the way we do business.

I am currently the group circulation director of a cluster of newspapers in New York State and already have felt the impact of guidelines that have been approved in our state. These regulations are making it extremely difficult for newspapers to provide to present prospective readers the opportunity to subscribe to our newspapers immediately. We are small newspapers that cannot afford to operate in house telemarketing rooms and look to these companies as partners in increasing our readership. These new rulings will only drive the cost of telemarketing up which in return will cost us additional unnecessary costs.

Telemarketing is central to our fiscal health. We rely on telemarketing as our primary source of new readers. Sixty percent of our new sales are generated through telemarketing. We also use telemarketing to obtain subscription renewals. As you can see this is vital to our success. We are providing our consumers a great value on a product that is used universally.

I hope you will rethink your stand on the proposals and also review the response the Newspaper Association of America submitted to you. Thank you for the opportunity to address this serious issue.

Sincerely,

Robert J. Kazeangin Jr.
Group Circulation Director
Greater Niagara Newspapers