

Michigan Nonprofit Association

"Serving Michigan's nonprofit sector for over a decade"

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President and CEO

April 9, 2002

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

To Whom It May Concern:

On behalf of the Michigan Nonprofit Association and its more than 650 members across the state, I urge you to consider exempting charitable organizations from the amendments to the Telemarketing Sales Rule (TSR), which creates a national "do not call" registry for business and nonprofits.

The Michigan nonprofit sector is comprised of more than 38,000 nonprofit organizations. Of these, 19,000 are 501(c)(3) nonprofits which means their purpose is religious, educational, charitable, scientific, literary or cultural. The scope of the nonprofit community ranges from large institutions like state universities to small groups like local food banks. Nonprofits work with every issue of concern to Michigan residents – from education to health, human services to the arts, economic development to the environment.

Seeing the important role charities play in the state, the overarching concern with requiring these groups to abide by a national "do not call" registry is that such a demand would decrease donations to these worthy causes, thus negatively impacting the quality of life for Michigan residents.

First, there are no statistics available that a substantial amount of consumer complaints stem from telemarketing by charities. In fact, the general public tends to view telephone solicitation by charities as different from telemarketing by business. In addition, an individual that asks to be placed on the registry may not consider providing authorization for certain organizations to call. Hence, these groups could be forbidden from calling their own supporters and the list of potential donors for new organizations would be cut significantly.

AN ALLIANCE TO PROMOTE GIVING, VOLUNTEERING AND A STRONG, EFFECTIVE NONPROFIT SECTOR IN MICHIGAN

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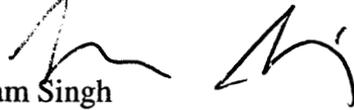
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Second, smaller groups frequently have volunteers call their neighbors asking for support of community organizations. Mandating that charities “scrub” their lists of those on the registry would be burdensome to smaller charities that have few resources to conduct fundraising campaigns.

Finally, we ask that the Commission consider whether this is the time to limit charitable organization’s donor bases when the economy and world events are making it difficult to fundraise.

Thank you for your time and consideration of our requests. If you have any questions, please feel free to contact me.

Sincerely,


Sam Singh
President and CEO

Cc: Audrey Alvarado, National Council of Nonprofit Associations
Pat Read, INDEPENDENT SECTOR