



UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

In the Matter of Telemarketing Rulemaking –

FTC File No. R411001

COMMENTS OF TELESTAR MARKETING, L.P.
ON THE PROPOSED REVISIONS TO THE
TELEMARKETING SALES RULE

INTRODUCTION

I am the President of TeleSTAR Marketing, L.P., a telemarketing business, with offices in Media, Lancaster and Reading, Pennsylvania. We employ over 300 part and full time people. TeleSTAR primarily markets for Cable TV companies throughout the United States selling premium, internet and digital services to their existing customers. Comcast, AT&T, Charter, Millennium, Adlephia, and Time Warner are some of our largest cable clients as well as HBO, Showtime and STARZ, the premium services. We also jointly work with TV Guide and the cable companies selling subscriptions of the Guide to cable subscribers.

TeleSTAR is in business because consumers like what we offer and we make it easy and affordable for them, The vast majority of people we call are pleasant and willing to hear about various services that cable is offering.

As a long time member of the American TeleServices Association, I have supported the existing Telemarketing Sales Rule, however, I have real difficulty with the revisions proposed in this proceeding. I cannot envision that it will do anything to curtail illegitimate telemarketers – what it will do is penalize those of us who sell millions of dollars worth of products and services that continue to benefit consumers and the economy.

In particular, I oppose the following provision proposed by the FTC:

Creation of a National Do-Not-Call Registry:

The present Do-Not-Call list, which is company specific, gives the consumer the ability to select those they do or don't want to receive calls from. In many instances the people we contact are thankful for the call which has educated them on new products and services, as well as offering them an opportunity to buy at a bargain rate. The proposed FTC registry is not the answer and will not only add confusion but will certainly add to the Government's cost to operate. I have never been able to understand how any governmental body can create carte blanche DNC rules and/or legislation that can prevent calls to a particular individual by companies that have an existing business relationship with them.

Blocking of Caller ID

As long as a telemarketing vendor does not take any action to purposely block or disrupt the ID signal, I have no problem supporting the position that it would be a violation to do same.

Predictive Dialers

In addition, I have serious concerns regarding restrictions on the use of predictive dialers, This technology has increased efficiency by reducing marketing costs which in turn saves consumers money. Any effort to curtail or eliminate its use would cause serious and significant cost increases to all businesses that use telemarketing. This cost would probably be passed on to the consumer.

While I fully recognize the political nature of telemarketing issues and understand the Commission's reasoning to study these concerns, it is imperative that the underlying negative impacts to the economy and to the millions employed in our Industry be given careful and thoughtful consideration.

I may be reached at 610 891-7100 x2665 if you have any questions.



Arthur H. Saxon March 20, 2002
President