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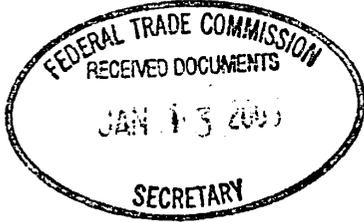
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January 12, 2005

VIA OVERNIGHT MAIL

Federal Trade Commission/Office of the Secretary
Room H-159 (Annex K)
600 Pennsylvania Ave, N.W.
Washington, D.C. 20580

Re: Prerecorded Message EBR Telemarketing, No. R411001

Dear Sir/Madam:

On behalf of our client Minacs, we are pleased to submit for consideration by the Federal Trade Commission the attached comments regarding proposed amendments to Telemarketing Sales Rule. Specifically, Minacs' comments address prerecorded messages to customers with an existing business relationship and the "abandoned call rule." The comments are being submitted in response to the Commission's November 12, 2004 Request for Comments.

If we can provide any further information or if you have any questions, please do not hesitate to contact me.

Very truly yours,

Michele A. Shuster

MAS/lkz

Enclosures

cc: Mike Kosla, Minacs



January 12, 2005

Federal Trade Commission/Office of the Secretary
Room H-159 (Annex K)
600 Pennsylvania Ave, N.W.
Washington, D.C. 20580

Re: Prerecorded Message EBR Telemarketing, No. R411001

Dear Office of the Secretary:

Minacs appreciates the opportunity to comment in response to the Federal Trade Commission's ("FTC") proposed amendment of the Telemarketing Sales Rule ("TSR") that would allow telemarketers to use prerecorded messages when they call consumers with whom they have an established business relationship and that would require telemarketers to use technology that ensures abandonment of no more than three percent of all calls answered by a person, measured over a 30-day period. Minacs commends and supports the FTC's efforts and offers the following comments.

Minacs' Background

Minacs provides customized business process outsourcing (BPO) solutions focused on three core areas of capability: contact center solutions, integrated marketing services, and back office administration. Minacs employs more than 4500 employees from operating locations in Canada, the United States, and Europe, and has established successful industry practices with clients in the automotive, financial services, telecom and technology, public sector and consumer products verticals.

Amendments to the TSR

The FTC sought comment on a proposed amendment to the TSR which would create an additional call abandonment safe harbor for telemarketing calls that deliver a prerecorded message to consumers with whom the seller has an established business relationship. Additionally, the FTC proposes to amend the TSR's call abandonment safe harbor provision to calculate abandoned calls monthly rather than daily. These proposed amendments would align the FTC's requirements with the FCC's requirements.

Minacs' Comments

Minacs lauds the FTC in attempting to create a single standard for telemarketing. Although Minacs does not currently operate any programs that utilize prerecorded messages, our

clients have inquired about that option. Therefore, Minacs supports the FTC's proposed amendment with regard to prerecorded messages. By aligning with the FCC rules and allowing for this type of call to customers with whom there is an existing business relationship, Minacs could deliver an effective message to our client's customers in a cost effective way. Furthermore, customers who object to this type of message will be removed from the lists. This allows Minacs to honor the requests of customers without denying them the opportunity to receive information from companies of which they have a business relationship. Therefore, Minacs supports this proposed safe harbor.

Minacs also supports the FTC's proposal to calculate abandoned call rates monthly rather than daily. This change would remove a burden on resources. Since all of Minacs' campaigns are targeted to existing customers, we have always been highly attentive to the aggravation that can be caused by unnecessary abandoned calls. Therefore, Minacs always operated below the three percent abandoned call rate even prior to the new rules. Nonetheless, circumstances can arise that would affect our ability to minimize abandoned calls. As our calling periods only last for four to six hours out of a day, it could be difficult to make the necessary adjustments to affect the abandoned rates for a single day. However, corrections are made as soon as possible and would be reflected in a monthly calculation. Accordingly, we strongly support this proposal to calculate abandoned call rates monthly.

Minacs and others in the industry will benefit from the FTC's proposed amendments to the TSR. Minacs is always working to increase the efficiency of our operations through innovative technology which will enhance our workflow and provide superior service to our clients. We encourage the FTC to adopt the proposed amendments and align with the FCC's rules to facilitate compliance with the telemarketing rules.

We appreciate the FTC's consideration of our comments.

Sincerely,

/s/ Mike Kosla

Corporate Compliance Officer