

This is a step in the wrong direction. Any changes and harmonization should be in the direction of strengthening do-not-call, not weakening it.

Sales calls remain a problem, because of the business relationship exception. The exemption should be limited to necessary contacts to service the existing relationship, not attempts to sell additional services.

However, if that is not possible is it essential that the call be made by a human being, so that the recipient can conveniently protest and ask to be placed on the company's do-not-call list.

Any call that can be made by pre-recorded message is unlikely to be about the prior business relationship, because the content of such a message would vary from customer to customer. It is almost certainly a sales call.

Also, requiring the call to be made by a person imposes a cost on the caller. Without that cost, there would be even more junk calls. If even the caller knows the call is not important enough to be worth paying someone to make it, it is definitely not worth my time to answer it.

Abandoned calls should not be permitted at all. A call should never be placed before there is someone available to talk to the consumer. That rule would be another way of increasing the cost to the caller, and therefore reducing the number of junk calls, while reducing consumer inconvenience. Again, if prior relationship calls are really about the prior relationship, they should be infrequent enough that the cost would be trivial. In the context of this rule making, lengthening the measurement period would be another step in the wrong direction.