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To Whom It May Concern:

CenterPost Communications annually delivers approximately 100 million pre-recorded outbound calls on behalf of its clients in travel, pharmacy, banking and insurance industries. All calls are to consumers with an established business relationship. These calls include:

- On-boarding (welcome calls, transaction confirmations);
- Transaction updates (flight status, order status, expiration notices);
- Renewal reminders (policy renewals, prescription renewals); and
- Retention programs (satisfaction surveys, wellness programs, tips and tricks).

CenterPost offers a web-based opt-in service where consumers define what information they would like to receive and to what channel (voice, email, text message or fax). To date, CenterPost has captured over one million opt-in consumer profiles.

CenterPost does not believe it is in the consumer's best interest to require opt-in as a common business practice where immediate communications are relevant and meaningful. For instance, industries such as healthcare and insurance do not have enough transactional or variable demand that warrants a consumer taking the extra effort to opt-in to receiving critical communications around prescription renewals or insurance lapses.

Consumers highly value the convenience of pre-recorded calls and the ability to transact business without having to remember to contact a live agent, call into the inbound IVR number or fill out and send in a mail order form. CenterPost's experience has shown:

- 66-82% of customers renew a policy or prescription in an outbound automated call;
- 33-48% of customers select additional products or services along with the renewal; and
- 5-13% of customers renew policies prior to lapse.

In addition, customers are very satisfied in receiving pre-recorded calls. As a detailed example to this value, CenterPost analyzed survey data on two specific calls that included a solicitation for renewal:

Survey 1:

CenterPost contacts pharmacy customers who are due for a refill of brand-name prescription drugs and offers them a generic or different brand prescription drug that may save the consumer

money. The consumer elects to refill their prescription with the newly offered brand or generic, with the original brand, or not to refill at all. From the period October 1, 2005, through October 1, 2006, CenterPost offered a survey to 72,475 consumers, of which 32,343 (45%) elected to take the survey. When asked "Do you find this notification useful?" 28,903 (89.4%) replied "yes" and 3,440 (10.6%) replied "no."

Not only are the satisfaction and renewal metrics high, compliancy on taking prescription medications has increased upwards of 30%.

Survey 2:

CenterPost contacts pharmacy customers who are due for a refill. The consumer elects to refill their prescription or not to refill at all. From the period October 1, 2005 through October 1, 2006, CenterPost offered a survey to 310,175 consumers, of which 246,761 (80%) elected to take the survey. When asked to rate their satisfaction with this prerecorded outbound call on a five-point scale, 197,083 (80%) selected the highest level of satisfaction (Extremely Satisfied), and 232,742 (94%) selected one of the top two levels of satisfaction (Extremely Satisfied or Highly Satisfied).

Because these calls also offer an opt-out, if the consumer is dissatisfied or does not wish to receive these calls, they can press a key and they will be opted-out of future calls. Approximately 75% of all calls sent by CenterPost have in-call opt-out included. Over the most recent five months, only 0.7% of all contacted consumers elected to opt-out from receiving future pre-recorded calls, regardless of their satisfaction or usefulness rating. Additionally, an average call length of over one minute indicates that consumers are listening to the full message.

CenterPost encourages the FTC to recognize the feedback of consumers who value these calls and modify its ruling accordingly.