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Lorenzo Tutt
Secretary-Treasurer
Kansas City, Missouri

March 14, 2002

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

Dear Sir/Madam:

I am writing to you on behalf of the Missouri State Council of Firefighters to express **our objection** to the Federal Trade Commission's proposal to amend the Telemarketing Sales Rule. The proposed **application** of a national "do not call" registry to **our organization** is **unfair**, unwise and unworkable.

As fire fighters, we make it our business to **serve our** communities to the greatest extent possible. **Our fire** fighter organization is a non-profit entity **that** relies extensively upon small gifts **from a large number** of people to support **numerous** charitable activities. Through such contributions, we have been able to supply smoke detectors to citizens who cannot afford them, support women's shelters, contribute to schools for special **needs** children, contribute to children's **burn camps**, and support such **charities** as the M.D.A.

The proposed rule is **unfair** because it would create a "do not call" registry **maintained** by the federal government **that** would apply to **fundraising calls** made **on behalf** of **our** organization to support **our** charitable activities, but would not apply to **politicians'** fundraising calls or phone solicitations by banks, telephone companies and insurance companies. Beyond being **unfair**, this simply does not make any **sense**.

The proposed rule is unwise **because** it would prohibit **our** organization **from** contacting individuals on the "do not call" list even if they had consistently donated to **our** organization in the past and would still like to do so in the future. At a time when government is relying upon non-profits and charities to do more, it should not undermine the ability of organizations such **as our own** to provide valuable services to the **public**.

Finally, the proposed rule is unworkable **because** it violates **our** First Amendment **right** to contact members of the public. The Supreme Court **has** consistently held **that** any limitation on free speech must **be** narrowly **drawn** and use the least intrusive **means**. This rule satisfies neither of these requirements and further violates the Constitution **because** it favors calls from commercial interests, such **as** banks and **insurance** companies, over calls made **on behalf** of non-profits.

Please reconsider **this** amendment in light of these concerns, and **reject** the proposal to apply the "do not call" registry to calls made **on behalf** of non-profit organizations.

Sincerely,

John M. Corbett, President

Member of International Association of Fire Fighters
Affiliated with Missouri State Labor Council, AFL-CIO
Heart of America Labor Council
St. Louis Labor Council

