



Baltimore Administrative Office  
520 Park Avenue  
Baltimore, Maryland 21201-4500

June 1, 2004

**Federal Trade Commission**

Office of the Secretary  
Room 159-H (Annex K)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Re: **Telemarketing Sales Rule Fees, Project #P034305**

Dear Commissioners:

On behalf of Stonebridge Life Insurance Company, I would like to submit comments relative to the above-referenced matter concerning the Federal Trade Commission's intent to amend the Telemarketing Sales Rule to revise the fees charged to entities accessing the National Do-Not-Call Registry. The basis for the Federal Trade Commission's actions to have fee increases is due to the fact that fewer entities are paying for full access to the National Do-Not-Call Registry than the Federal Trade Commission predicted in setting forth the original fee structure. Under the Federal Trade Commission proposal, the fee per area code would increase from \$25 per area code to \$45 per area code. This will result in an increase in the maximum cost of \$12,375, up from \$7,375. Stonebridge Life Insurance Company objects to the rate increase, as the company feels that the assessment of the fee is unfairly burdensome upon those entities similar to Stonebridge Life Insurance Company that utilize the National Do-Not-Call Registry process and pay the full access costs.

As the Notice of Proposed Rulemaking so states, the Federal Trade Commission predicted that 10,000 entities will be required to pay for the full access to the National Do-Not-Call Registry, but only 6,000 have paid to do so. The notice further states that 45,500 entities have had access to five or fewer area codes at no cost, and approximately 900 exempt entities have had access to the National Do-Not-Call Registry at no charge. It is our contention that we should not be obligated to subsidize these other operations, that being small business and exempt organizations. These organizations derive benefit from access to the National Do-Not-Call Registry. They should be obligated to either pay the full access fee or some portion of the fee. To have access to the National Do-Not-Call Registry at no charge shifts the burden of cost to entities such as Stonebridge Life Insurance Company. It is our belief that having small businesses and

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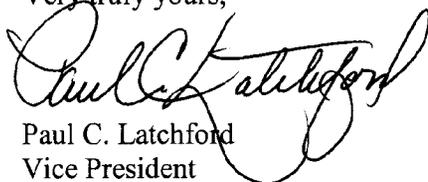
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exempt organizations being charged a fee at a level equal to those entities similar to Stonebridge Life Insurance Company or even a portion of the fee is not unduly burdensome on these operations. We believe that the Federal Trade Commission needs to explore other alternatives to shift this burden of having companies like Stonebridge Life Insurance Company subsidize the funding of the National Do-Not-Call Registry and do so in a more equitable manner so that all parties equally share or that there be a payment made at a reduced level for small businesses and exempt organizations so that monies received from small businesses and exempt organizations can offset the needed increases.

I trust that you will give consideration to our comments.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul C. Latchford", written in a cursive style.

Paul C. Latchford  
Vice President  
(410) 209-5492

PCL/mc