

**HOUSEHOLD**   
April 2, 2002

Consumer Lending

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

To: Federal Government  
Subject: Telemarketing Rulemaking – Comment, **FTC** file number R411001

As an employee of Household's consumer lending business (HFC / Beneficial). I am opposing the FTC's proposed changes to the Telemarketing Sales Rule (TSR) for the following reasons:

1. I work for a financial services company that employs more than 30,000 people in this country. The ability to reach our customers is critical to **our** ability to conduct **business**. Passage of this **new** rule may have a negative impact on my **job** as well as other **jobs** in my company.
2. Household offers much needed credit to millions of consumers in the United States at reasonable prices. However, every additional regulatory burden raises the **cost** of credit to **our** customers **and their families**.
3. While the concept of a national "do not call" list is a good idea, the proposed changes layer a national list onto a patchwork of state lists and requirements. A more ~~the~~ answer – for both consumers and businesses—is to create a "master" list, perhaps led by **the FTC**. Otherwise, you are simply creating a **potential fifty-first state list and massive confusion**.
4. The proposal to create a **national list is vague and undeveloped**. For example, **who will fund** the list? Who will **have** access to it? Will a telephone number or **name** drive it? **What** will **ensure that the list** will **only be used for the purpose** for which it is intended?
5. Numerous other problems exist that would severely impact Household's ability to conduct business. In particular, **the provision that** would force us to treat inbound calls the same **as** outbound calls, would severely limit **our** ability to offer valuable products and **services to our own** customers.

I am urging the FTC to withdraw **the** proposal in its current form. While well **intentioned**, the proposed **changes are vague to the point** of unenforceability. If passed in its current form, it will unnecessarily raise the cost of products **and** services that our customers depend **on**, and it could impact hundreds of thousands of jobs throughout the financial services **industry**.

Respectfully,

