

April 15, 2002

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

Re: Telemarketing Rulemaking – Comment. FTC File No. R411001

Dear Mr. Secretary:

1. I am writing on behalf of Gottschalks Inc. and its customers.
2. I am an officer of this company which has been headquartered in Fresno, CA since 1904. We currently operate 74 department stores in six western states. Our geographic reach extends more than 2500 miles from Palm Springs, CA to Fairbanks, AK. We process our own proprietary credit card with more than 750,000 active Gottschalks credit card customers.
3. I applaud your efforts in creating a national “Do Not Call” list. Most Americans will appreciate an easy way to block unwanted solicitation calls. However, when you draft proposed language, I ask that you distinguish between intrusive sales calls and other customer contacts made by phone.
4. Our company makes as many as several hundred thousand calls each month to customers with whom we have an existing business relationship. We often call our customers to invite them to special events. We never sell anything over the phone.
5. Our customers appreciate these calls so much, that we receive complaints from some who do not receive the calls. They learn about our events from friends who did receive them.
6. To demonstrate the consumer benefit from these non-sales calls, I would be willing to collect comments from a sample of our customers during our next calling promotion on May 7th, 2002. I ask that the Commission consider this letter, and accept for filing and informal consideration our subsequently submitted customers’ comments, during its deliberations on this rule.

Respectfully submitted,

Bret Levy, VP Treasurer
Gottschalks, Inc.
7 River Park Place East
Fresno, CA 93720