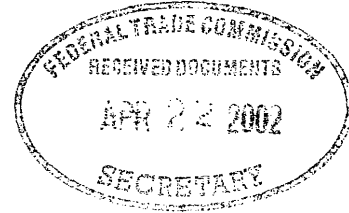




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Wednesday, April 10, 2002

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



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

Dear Sir or Madam:

I am writing on behalf of Project Angel Food, a Los Angeles based non-profit that provides nutritious meals for individuals disabled by HIV/AIDS. Since our agency receives limited support from government grants, we rely on our fundraising efforts to provide the resources necessary to continue our life saving. Telefundraising, performed by the telemarketing firm we retain, is an important component of our fundraising. The purpose of this letter, therefore, is to offer my comments to the proposed changes to the Telemarketing Sales Rule, and the impact it may have on our organization.

Project Angel Food supports the FTC's efforts to eliminate and investigate fraud in the non-profit sector. In the past, non-profits like ours have been exempt from the provisions of the TSR, but we voluntarily comply in areas of disclosure, calling hours, etc. As a responsible organization sensitive to the needs of our donor base, we maintain our own do not call list and give our donors opportunities to "opt-out" of telephone solicitation. As an organization doing business in the State of California and Los Angeles County, we also comply with the registration and reporting requirements placed on non-profits by those government agencies. We also make certain that the telemarketing firm we retain also complies with these requirements.

The proposed changes to the Telemarketing Sales Rule will severely curtail the telefundraising our organization conducts. Last year, \$ 2,371 were raised through the telephone, and these campaigns were among the most cost effective fundraising efforts. Furthermore, our monthly donors generated through telemarketing raise \$3,456 per year for our agency. This is income we cannot replace. Loss of this income may result in a waiting list for our services or people in need going without nutritious meals.

We oppose the creation of a national do not call registry. From everything we have read and heard, the calls from banks, long distance carriers and home improvement companies are the calls people object to most, and they will be exempt. Running the FTC do not call registry against our master file every time we run a campaign will place an undue burden on Project Angel Food, and will prevent us from contacting donors who appreciate our calls. Since we already maintain our own do not call list, and since our donors have other methods for screening their calls, such as like caller ID, phone butlers and other privacy manager products, the addition of the national do not call list will be redundant. Furthermore, it will be ineffective in eliminating the abusive and fraudulent telemarketing that occurs.

We appreciate this opportunity to make you aware of the impact the creation of a national do not call registry will have on organizations such as ours. If the proposed registry becomes a reality, we urge you to exclude non-profits (registered 501C3's, 501C4's and PACs), and also urge you include an exemption for pre-existing relationships.

Sincerely,


Jamie A. Natelson
Director of Development
& Communications

for Life, for Love, for as long as it takes