ANNUAL REPORT TO CONGRESS FOR FY 2007

PURSUANT TO THE DO-NOT-CALL IMPLEMENTATION ACT ON IMPLEMENTATION OF THE NATIONAL DO NOT CALL REGISTRY

NATIONAL
DO NOT CALL
REGISTRY

Federal Trade Commission

July 2008

Table of Contents

I. Introduction

The National Do Not Call Registry ("National Registry" or "Registry") is, by virtually every available measure, an effective consumer protection initiative. By the end of FY 2007, there were more than 145 million telephone numbers on the National Registry. The available data show that compliance with the National Registry provisions of the Amended Telemarketing Sales Rule ("Amended TSR")[1] is high and that, as a result, consumers are receiving fewer unwanted telemarketing calls.

The Do-Not-Call Implementation Act ("DNCIA"),[2] signed into law on March 11, 2003, mandates, *inter alia*, that the Federal Trade Commission ("FTC" or "Commission") and the Federal Communications Commission ("FCC") each transmit to Congress an annual report on the National Registry for fiscal years 2003 to 2007, inclusive. Specifically, the DNCIA requires that the FTC's annual report provide the following information:

1) an analysis of the effectiveness of the National Registry;
2) the number of consumers who have placed their telephone numbers on the National Registry;
3) the number of entities paying fees to access the National Registry and the amount of such fees;
4) an analysis of the progress of coordinating the operation and enforcement of the National Registry with similar registries established and maintained by various states;
5) an analysis of the progress of coordinating the operation and enforcement of the National Registry with the enforcement activities of the FCC; and
6) a review of the FTC's enforcement proceedings under the Amended Telemarketing Sales Rule, 16 C.F.R. Part 310.

This Annual Report from the FTC provides an overview of the operation of the National Registry through the end of FY 2007.[3]

The National Registry, which continues to provide consumers with an effective means to limit unwanted telemarketing calls, received over 19 million new registrations during FY 2007. Approximately 66,000 sellers, telemarketers, and exempt organizations accessed the National Registry during the fiscal year, with over 6,000 of those entities paying fees totaling more than $21.5 million. The FTC initiated three new cases alleging violations of the National Registry and resolved or added defendants to eight cases that were filed before FY 2007 but were still pending.

II. Analysis of the Effectiveness of the National Registry

During FY 2007, the Commission continued to use the following measures to judge the performance of the National Registry program:

1) ensuring that the National Registry remained fully operational throughout the year;

2) ensuring that the National Registry could enroll large volumes of consumer telephone numbers; and

3) reducing unwanted telemarketing calls to consumers who sign up for the National Registry, which continues to be the ultimate goal of the Registry.

Each of these measures is discussed in turn below.

Ensuring the National Registry is Operational Throughout the Year

The National Registry was built to accomplish four primary tasks:

1) to allow consumers to register their preference not to receive telemarketing calls at registered telephone numbers;

2) to allow telemarketers and sellers to access the telephone numbers included in the National Registry and to pay the appropriate fees for such access;

3) to gather consumer complaint information concerning alleged do not call violations automatically over the telephone and the Internet; and

4) to allow FTC, state, and other law enforcement personnel access to consumer registration, telemarketer access information, and complaint information maintained in the Registry.

Consumers can register their telephone numbers through two methods: either by calling a toll-free number from the telephone number they wish to register, or over the Internet. The process is fully automated, takes only a few minutes, and requires consumers to provide minimal personally identifiable information.[4]

Telemarketers and sellers can access registered telephone numbers and pay the appropriate fee for that access, if any, through an Internet website dedicated to that purpose. The only information about consumers that companies receive from the National Registry is the registered telephone number. Those numbers are sorted and available for download by area code. Companies also may check a small number of telephone numbers at a time via interactive Internet pages.

Consumers who receive unwanted telemarketing calls can register a complaint via either a toll-free telephone number, using an interactive voice response system, or via the Internet. To conduct investigations, law enforcement officials also can access data in the National Registry, including consumer registration information, telemarketer access information, and consumer complaints. Such access is provided through Consumer Sentinel, a secure Internet website maintained by the FTC, to the law enforcement community throughout the United States, Canada, and Australia.[5]

Since its implementation in 2003, the National Registry has continuously served several functions: providing consumers with the ability to register their preference not to receive telemarketing calls and file complaints; providing telemarketers with the ability to subscribe to the list, download registered telephone numbers, and request help; and providing thousands of law enforcement personnel with access to data maintained in the Registry. The National Registry remained fully operational throughout FY 2007.

Ensuring that the System Can Enroll Large Volumes of Consumer Telephone Numbers

Since inception, the National Registry has time-and-again proven to be capable of handling massive numbers of consumer registration requests. Within four days of the initial launch, more than 10 million telephone numbers were registered. After the first 40 days of operation, more than 30 million numbers were registered. By the end of FY 2003, a mere 13 weeks after the opening of registration, more than 51 million telephone numbers were included on the National Registry. By the end of FY 2004, more than 64 million telephone numbers had been registered on the National Registry; by the end of FY 2005, there were more than 107 million registered telephone numbers; and by the end of FY 2006, over 132 million numbers had been registered.

The National Registry's capability to enroll large numbers of consumer telephone numbers continued in FY 2007. In fact, in FY 2007 the Registry received over 19 million new registrations. During the most active period in FY 2007,[6] the Registry received more than six million consumer registration requests in a single month and more than two million in a single week. In FY 2007, there were seven weeks with over one million registrations. Since its inception, the Registry has experienced no outages and has continued to provide consumers with an uninterrupted mechanism by which to register their telephone numbers.[7] As a result, by the end of FY 2007, there were over 145 million telephone numbers on the National Registry.[8]

Reducing the Number of Unwanted Telemarketing Solicitations

The Commission believes that the fundamental goal of the National Registry — to provide consumers with a simple, free, and effective means to limit unwanted telemarketing calls — has been achieved. A recent independent survey conducted in October 2007 demonstrates that the National Registry continues to be an effective means for consumers to limit unwanted telemarketing calls. Harris Interactive® surveyed over 2,500 adults and found that of the 72% of Americans who had registered their telephone numbers for the "Do-Not-Call Registry," 18% reported that they currently received no telemarketing calls, 59% reported that they still received some, but far fewer than before they signed onto the Registry, and 14% said they received some, but a little less than before they registered. In addition, when asked about renewing their registrations, 25% of registered consumers had already renewed and 71% were planning to renew.[9] Thus, like the results of the prior Harris Interactive® and Custom Care Alliance surveys,[10] the results of the October 2007 survey illustrate that the National Registry is a success in terms of registration volume and reduction of unwanted telemarketing calls.

The National Registry complaint data also demonstrate the effectiveness of the Registry. During FY 2007, the FTC received 1,297,865 complaints from 433,065 unique registered telephone numbers, which constituted approximately 0.3% of the total number of registered telephone numbers at the end of FY 2007. This indicates both a high degree of compliance by telemarketers and a meaningful reduction in unwanted calls for consumers who have registered their telephone numbers.

III. Number of Consumers Who Placed Their Telephone Numbers on the National Registry as of the End of FY 2007

Americans continue to enthusiastically embrace the National Registry. As previously stated, in the first four days following the launch of the Registry on June 27, 2003, more than 10 million numbers were registered. As of September 30, 2003, a total of 51,968,777 telephone numbers had been registered. By the end of FY 2004, the number of registered telephone numbers reached 64,288,175; by the end of FY 2005 that number had increased to a total of 107,440,316 registered telephone numbers; and by the end of FY 2006, there had been 132,219,163 registered telephone numbers. As of September 30, 2007, there were 145,498,656 telephone numbers on the National Registry.

IV. Number of Entities Paying Fees for Access to the National Registry During FY 2007

In FY 2007, a total of 6,242 entities paid fees totaling $21,602,003 for access to the National Registry.[11] Since the Registry's inception, a total of 18,197 unique entities have paid fees for access to the National Registry. The total amount of fees paid by all entities since the inception of the National Registry through the end of FY 2007 is $80,629,778.

In addition, certain entities can access data from the National Registry without having to pay a fee. These include entities that access five or fewer area codes of data in a year, as well as entities that are exempt from the do not call requirements of the Amended TSR, but that voluntarily access the National Registry in order to avoid calling consumers who do not wish to receive calls.[12] In FY 2007, 59,337 entities accessed five or fewer area codes at no charge, and 801 entities claiming "exempt organization" status obtained free access. Since the Registry's inception, a total of 205,732 entities have accessed five or fewer area codes at no charge, and 3,076 entities claiming "exempt organization" status have obtained free access.

V. Analysis of Progress Coordinating the Operation and Enforcement of the National Registry with State Do Not Call Lists

At the time the FTC announced its intention to create a National Registry, more than two dozen states had some form of a do not call list. As noted in the Statement of Basis and Purpose for the Amended TSR,[13] the FTC has worked diligently with the states to further the goal of creating a single National Registry. Such a National Registry allows consumers to effect their preference not to receive telemarketing calls by going to a single governmental agency and streamlines the process for businesses, allowing them to have a single point of contact to obtain the list of all consumer telephone numbers that they should not call.

The dialogue with states regarding coordination of do not call efforts continued throughout FY 2007. Since the inception of the program, eight states that had established state do not call lists have stopped collecting consumer registrations at the state level.[14] Instead, they have relied upon the National Registry to enforce their state laws. Another ten states that did not have a state registry in place at the time enacted laws that "adopt" the National Registry as the state registry for state law purposes.[15] In addition, eighteen states that operated or continue to operate do not call lists contributed their data to the National Registry, with over 11.6 million telephone numbers transferred by those states to the Registry as of the end of FY 2007.[16] As of the end of FY 2007, seven states still have not shared their state lists with the National Registry.[17]

The FTC also assists states with their law enforcement investigations by enabling law enforcement officials to access data in the National Registry through the Consumer Sentinel website. Consumer Sentinel contains searchable information on registered phone numbers, organizations accessing the National Registry, complaints of registry violations, and top violator reports for each state. (*See also supra* note 5.)

VI. Analysis of the Progress of Coordinating the Operation and Enforcement of the National Registry with the FCC

The FTC and the FCC have worked closely to coordinate their efforts to enforce the National Registry. Since inception of the program, the two agencies have worked closely together to (1) ensure efficient enforcement of their respective do not call rule provisions, (2) avoid unnecessary duplication of effort, and (3) promote cooperation in investigations. During FY 2007, coordination has continued with regular meetings to discuss issues pertaining to do not call enforcement, including review of the agencies' respective enforcement priorities. This close cooperation, in combination with active enforcement efforts at each of the agencies, has sent a strong message to industry regarding the FTC's and FCC's commitment to mandating compliance.

VII. Review of the FTC's Enforcement Proceedings

Although compliance with the National Registry has been high, the FTC actively investigates and prosecutes violators. National Registry enforcement protects the success of the National Registry in safeguarding consumer privacy. The FTC also works with its enforcement partners at the U.S. Department of Justice ("DOJ"), the FCC, and the states to enforce the National Registry rules.

Violating the National Registry subjects telemarketers to civil penalties of up to $11,000 per violation. Civil penalty actions are filed by the DOJ on behalf of the FTC. Some violators of the National Registry also engage in fraud or other law violations. In these fraud cases, the Commission seeks equitable relief in federal court, such as injunctions against future violations, consumer redress, and disgorgement of profits.

As of September 30, 2007, the FTC had filed 25 cases alleging violations of the National Registry and had reached settlements in 22 of these cases, obtaining injunctive relief in all 22 cases. In 13 of the resolved cases, defendants paid civil penalties totaling more than $8.7 million. In the remaining resolved cases, defendants paid redress and/or disgorgement for other violations, totaling more than $8.4 million.

During FY 2007, based upon a review of do not call consumer complaints in Consumer Sentinel and based upon other investigative activities, the FTC initiated three new cases alleging violations of the National Registry. Additionally, the FTC resolved or added defendants to eight cases that were filed before and were pending into FY 2007. The following is a summary of these cases:

USA Home Loans, Inc.: This case against a mortgage services company and four related co-defendants alleged various violations of the Amended TSR, including calling telephone numbers listed on the National Registry and failing to pay the required fee for access to the Registry. The complaint was filed concurrently with a stipulated permanent injunction that prohibits future violations and that required defendants to pay a $35,000 civil penalty.[18]

Randall Leshin d/b/a Express Consolidation: The FTC's complaint alleged that a scheme, led by Florida attorney Randall Leshin, used a nonprofit company doing business as "Express Consolidation" to violate telemarketing rules. In addition to call-abandonment and do not call violations, the complaint alleged that Express Consolidation is a sham nonprofit company, created to sidestep telemarketing rules (which exempt legitimate nonprofit entities). The complaint also alleged that the defendants violated the FTC Act and the Amended TSR by misrepresenting the cost of services: that the services would result in estimated savings of a specified amount, typically several thousand dollars, and that the services would reduce the consumer's monthly payment or total debt, or would improve their credit rating. The complaint also alleged that the defendants violated the Amended TSR by failing to disclose the program's total costs, and by telling consumers that certain payments were refundable without disclosing all the limitations of the program's refund policy.[19]

Fusion Telekom: The FTC's complaint charged that the defendants, 9131-4740 Quebec, Inc. (doing business as Fusion Telekom), JPE Holdings, Inc., Jean-Pierre Brault, and Eli Foner, violated the FTC Act and the Amended TSR through misleading and fraudulent practices. The complaint also alleged that defendants called consumers whose numbers were on the National Registry, and that defendants never paid the fee required to access the Registry. Defendants allegedly marketed phone cards from Canada to U.S. citizens. Defendants' telemarketers posed as consumers' banks or credit card companies and promised that for $1 they would send a long-distance calling card for a trial period. However, defendants did not send the cards, but instead billed consumers' accounts on a monthly basis.[20]

The Broadcast Team: The Broadcast Team ("TBT"), on behalf of various clients, allegedly violated provisions of the Amended TSR by causing more than 64 million calls to be abandoned. The 2005 complaint also alleged that more than 250,000 calls were abandoned in delivering recordings soliciting ticket sales, and more than 200,000 calls in delivering recordings soliciting charitable contributions. Additionally, TBT called telephone numbers listed on the Registry. Named as co-defendants with TBT were TBT's owners, Robert J. Tuttle and Mark S. Edwards. The case was resolved in February 2007 with the entry of a permanent injunction against defendants requiring payment of $1,000,000 in civil penalties.[21]

Bezeredi: The FTC's complaint alleged that John Bezeredi, doing business as Dominion Investments (Dominion), Eurobond Fidelity Ltd. (Eurobond), and Imperial Investments (Imperial), violated both Section 5 of the FTC Act and the Amended TSR by telemarketing fake foreign bonds to U.S. consumers. Specifically, this Canada-based group misrepresented that consumers who bought from, or paid fees to, Dominion, Eurobond, or Imperial would receive regular cash payments, would be entered into monthly drawings to win cash prizes, or were highly likely to receive cash winnings. Further, the FTC charged that Bezeredi failed to disclose to consumers that importing and trafficking in foreign lotteries is a crime in the United States, and that the bond scheme he was pitching constitutes such a lottery. Finally, the complaint charged Bezeredi with violating the do not call provisions of the Amended TSR by calling, or causing other people to call, numbers on the National Registry, as well as by failing to pay the required fees for access to telephone numbers in the area codes he and his telemarketers called. The Court entered a summary judgment order against the Bezeredi defendants in April 2007 that includes strong injunctive relief and a consumer redress payment of $4,755,363.[22]

FMFG Inc.: FMFG did business as American Adjustable Beds, Tranquility Adjustable Beds, and California Sleep Research, and allegedly violated various provisions of the Amended TSR by calling consumers under the guise of taking a survey of consumers' sleep habits. FMFG defendants then made a sales pitch to consumers. (While genuine survey calls are exempt from the do not call provisions of the Commission's Amended TSR, sales calls are not.) In May 2007, the Court entered a default judgment against FMFG and its principal, Kurt Cuddy, requiring that they stop violating the Amended TSR, among other prohibitions, and requiring payment of a $900,000 civil penalty.[23]

Debt Solutions, Inc.: The FTC obtained a settlement in this case, originally filed in March 2006, that includes strong injunctive relief, but, based on inability to pay, no redress payment. According to the FTC and the state of Washington's complaint, Debt Solutions, Inc., and seven co-defendants violated various provisions of the Amended TSR through telemarketing a debt elimination program. The complaint alleged that the defendants violated the Amended TSR by calling phone numbers listed on the Registry; failing to pay the required annual fee for access to do not call listed numbers; and calling persons who had asked them to stop calling. According to the complaint, defendants falsely represented to consumers that they would be assigned a financial consultant whose special relationships with creditors would enable the consultant to negotiate substantially lower interest rates, saving consumers thousands of dollars, reducing their monthly payments, and paying off their debts three to five times faster — all without higher monthly payments. The complaint states consumers who purchased the program typically did not have their interest rates lowered at all, and, if they did, the reductions were rarely more than one percentage point.[24]

Srikanth Venkataraman, d/b/a Scorpio Systems, Ltd.: At the FTC's request, DOJ added defendants Software Transformations, Inc. (a successor corporation to Scorpio Systems, Ltd.) and Sridhar Bhupatiraju (an officer of Software Transformations, Inc.) to its 2006 complaint that alleged that Srikanth Venkataraman violated various provisions of the Amended TSR. According to the complaint, Venkataraman called numbers on the National Registry to hawk mortgage loans, refinancing, and other products and services to consumers. Additionally, Venkataraman failed to transmit its telephone number and name to consumers' caller identification service, and failed to pay the fee required to access the Registry. The telemarketer transmitted either no caller ID or a phony caller ID and, as a result, consumers were unable to contact the telemarketer to stop unwanted telemarketing calls.[25]

Centurion Financial Benefits: The FTC obtained settlements in FY 2007 from several of the twenty-one defendants in this action, originally filed in 2005 against a Canada-based common enterprise that allegedly telemarketed advance-fee credit cards and stored-value cards. The complaint also alleges that defendants called numbers on the Registry and failed to pay Registry access fees. Final orders were entered by the Court against certain defendants on several dates in FY 2007 (and one date in FY 2008). The orders contain strong injunctive relief against all of the corporate defendants and many of the individual defendants and require payment (as yet not collected) of $9,894,514.[26]

Del Sol, LLC: In December 2006, the FTC obtained a settlement of this 2005 action that required defendants to pay consumer redress of $236,261 and to stop violating the Amended TSR and the FTC Act. The complaint alleged that defendants, preying largely on Spanish speaking consumers, misrepresented material aspects of the goods and services that defendants telemarketed, that they called numbers on the Registry, and that they failed to pay the Registry access fee. Defendants, using a deceptive prize-promotion door opener, told consumers that they would have to purchase brand-name items at a deep discount, to obtain their prizes. Consumers who purchased defendants' purported brand-name goods received cheap "knock-off" goods from defendants instead.[27]

DirecTV: The final two telemarketers who had not settled in the 2005 case against DirecTV agreed to permanent injunctions that required payment, collectively, of $100,000 and that contained strong injunctive relief.[28]

VIII. Conclusion

Since its inception, and without interruption, the National Registry has successfully accepted consumer registrations and complaints, allowed businesses to obtain access to Registry data, and provided law enforcement with the tools and information that they need to investigate complaints and bring enforcement actions. During FY 2007, the National Registry managed large volumes of consumer registrations without incident and, as of the end of the fiscal year, more than 145 million telephone numbers were on the Registry. As a result of the recently enacted 2007 DNCIA, consumers whose registrations would have expired in summer 2008 no longer need to re-register their numbers.[29]

To promote the ongoing success of the National Registry, the FTC continues to pursue an active enforcement program, with numerous ongoing non-public investigations, which, as of the end of FY 2007, have resulted in twenty-five cases being filed, twenty-two of which have settled, bringing significant relief to consumers. Even though the FTC pursues an active enforcement program, data from surveys and analysis of complaints about do not call violations strongly suggest that compliance with the National Registry provisions of the Amended TSR is high and that consumers are receiving fewer unwanted telemarketing calls.

Endnotes

1) 16 C.F.R. Part 310.

2) Pub. L. No. 108-10, 117 Stat. 557 (2003).

3) On February 15, 2008, Congress passed the Do-Not-Call Registry Fee Extension Act of 2007 (Pub. L. No. 110-188, 122 Stat. 635 (2008)) ("Fee Extension Act"), establishing the fees that entities accessing the National Registry will be required to pay beginning FY 2009, and the Do-Not-Call Improvement Act of 2007 (Pub. L. No. 110-187, 122 Stat. 633 (2008)) ("2007 DNCIA"), eliminating the automatic removal of registered numbers. These Acts include provisions outlining future reporting requirements the Commission must satisfy.

4) In the case of registration by telephone, the only personal information provided is the telephone number to be registered. In the case of Internet registration, a consumer must provide, in addition to the telephone number(s) to be registered, a valid e-mail address to which a confirmation e-mail message can be sent. Once the confirmation is complete, however, the e-mail address is hashed and made unusable. Thus, only consumers' telephone numbers are maintained in the National Registry.

5) In addition to National Registry complaints and registry information, Consumer Sentinel contains millions of fraud and identity theft complaints that can be accessed by law enforcement officials. Other Consumer Sentinel tools include: (1) an "alert" function that allows users to flag companies, suspects, and identity theft victims that are part of an investigation in order to inform other law enforcers using Consumer Sentinel; (2) an "auto query" function that will periodically scan the database for new complaints relating to the user's interest and notify the user via e-mail if it finds any new complaints meeting his/her criteria; (3) top violator reports that allow users to identify companies or individuals receiving the most complaints; (4) consumer fraud and identity theft trend reports prepared by FTC data analysts; (5) an index of taped, allegedly fraudulent telemarketing sales pitches available from the National Tape Library; (6) a list of all registered Sentinel law enforcer users with contact information; (7) a library of reference materials and website links, how-to manuals for investigating different types of fraud, and periodicals; and (8) the ability to add complaints on behalf of consumer fraud and identity theft victims, that are then entered into Consumer Sentinel.

6) The most active period was in fall 2007.

7) The Registry accepts registrations from both land-line and cell phones. The FTC has circulated a press release titled "The Truth about Cell Phones and the Do Not Call Registry," which addresses the false statement made by a re-circulating e-mail claiming that cell phone numbers will be released to telemarketers. The press release is available at http://www.ftc.gov/opa/2007/10/dnccellphones.htm.

8) The FY 2004, FY 2005, and FY 2006 totals represent the total number of unique telephone numbers that were registered at any time since the National Registry's inception. For FY 2007, the Commission is reporting the number of active registrations, which excludes those telephone numbers that have been deleted by consumers or eliminated as part of the Commission's removal process. A telephone number that was registered more than once between FY 2003 - FY 2007 is counted only once in these totals. The total number of registrations for FY 2007 includes 11,646,230 unique telephone numbers that were transferred by states to the National Registry as of the end of FY 2007.

9) After this poll was taken, the 2007 DNCIA was passed, eliminating the need for consumers to re-register their numbers every five years.

10) In January 2004, Harris Interactive® surveyed nearly 3,400 adults and found that 92% of those who signed up for the National Registry had received fewer telemarketing calls since signing up, and 25% stated that they had received no telemarketing calls. Customer Care Alliance surveyed 850 adults nationwide between February and April 2004. In this survey, the 60% of respondents who had registered their primary home telephone number on the National Registry reported that they had experienced an 80% reduction in the volume of telemarketing solicitations since registration. In September 2005, the Customer Care Alliance performed a two-question follow-up study. The survey found that approximately 73% of those who responded to the poll had registered their primary home telephone number on the National Registry, a 19.7% increase in registrations from the prior year. In its December 2005 survey, Harris Interactive® found that 76% of all U.S. adults had registered for the National Registry compared to 57% in 2004, a one-third increase in registrations. The survey again found that 92% of U.S. adults who had placed their numbers on the registry reported receiving fewer telemarketing calls.

11) In FY 2007, the annual fee per area code was $62 (with the first five area codes provided at no cost) with the maximum annual fee for accessing the entire National Registry being $17,050. *See* 71 Fed. Reg. 43048 (July 31, 2006). At the beginning of FY 2009, the annual fee per area code will become $54 (with the first five area codes again provided at no cost) with the maximum annual fee for accessing the entire National Registry decreasing to $14,850. *See* the Fee Extension Act.

12) Such "exempt" organizations include entities that engage in outbound telephone calls to consumers to induce charitable contributions, to raise funds for political purposes, or to conduct surveys. They also include entities engaged solely in calls to persons with whom they have an established business relationship or from whom they have obtained express written agreement to call, pursuant to the Amended TSR, 16 C.F.R. § 310.4(b)(1)(iii)(B)(*i*) or (ii), and who do not access the National Registry for any other purpose.

13) 68 Fed. Reg. 4580, 4638 (Jan. 29, 2003).

14) Those states are Alabama, Connecticut, Kansas, Kentucky, Maine, New York, Oregon, and Vermont.

15) Those states are Arizona, California, Illinois, Michigan, Montana, New Hampshire, Nevada, New Mexico, North Dakota, and South Dakota.

16) The states that have transferred registrations to the National Registry are as follows: Alabama, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Idaho, Kansas, Kentucky, Massachusetts, Maine, Minnesota, Mississippi, New York, North Dakota, Oklahoma, and Pennsylvania.

17) Those states are Indiana, Louisiana, Missouri, Tennessee, Texas, Wisconsin, and Wyoming.

18) United States v. USA Home Loans, Inc., *et al.*, No. JFM 06 CV 2850 (D. Md. filed Oct. 31, 2006). The permanent injunction is available at http://www.ftc.gov/os/caselist/0423148/061031usahomeloansstlmnt.pdf.

19) FTC v. Randall L. Leshin, *et al.*, No. 0:06-cv-61851-WJZ (S.D. Fla. filed Dec. 12, 2006). The complaint is available at http://www.ftc.gov/os/caselist/0523146/061212expressconsilidationcmplt.pdf.

20) FTC v. 9131-4740 Québec, Inc., *et al.*, No. 1:07-cv-02242 (N.D. Ohio filed July 25, 2007). The complaint is available at http://www.ftc.gov/os/caselist/0523081/070725fusiontelekomcomplaint.pdf.

21) United States v. The Broadcast Team, Inc., *et al.*, No. 6:05-cv-01920-PCF-JGG (M.D. Fla. filed Dec. 29, 2005). A stipulated permanent injunction was entered on February 2, 2007, available at http://www.ftc.gov/os/caselist/0523025/0523025.shtm.

22) FTC v. Bezeredi, *et al.*, No. 2:05-cv-01739-MJP (W.D. Wash. filed Oct. 17, 2005). The permanent injunction, entered on April 3, 2007, is available at http://www.ftc.gov/os/caselist/0423152/070403bezeredifinaljdgmnt.pdf.

23) United States v. FMFG, Inc., *et al.*, No. 3:05-cv-00711 (D. Nev. filed Dec. 29, 2005). The complaint is available at http://www.ftc.gov/os/caselist/0423155/051229calsleepresearchcmplt.pdf.

24) FTC and State of Washington v. Debt Solutions, Inc., *et al.*, No. 2:06-cv-00298-JLR (W.D. Wash. filed March 6, 2006). The permanent injunction, entered June 18, 2007, is available at http://www.ftc.gov/os/caselist/0523002/070522debtsolustipfnljdgmnt.pdf.

25) United States v. Venkataraman, *et al.*, No. 06-1928 (MLC) (D.N.J. filed April 25, 2006). The Commission authorized the filing of an amended complaint on August 10, 2007 (*see* http://www.ftc.gov/opa/2007/08/scorpio.shtm).

26) FTC v. Centurion Financial Benefits LLC, *et al.*, No. 05 C 5442 (N.D. Ill. filed Sept. 21, 2005). Permanent injunctions are available at
http://www.ftc.gov/os/caselist/centurion/070525centurioncorpdefsstipfnl.pdf,
http://www.ftc.gov/os/caselist/centurion/070921centurion-bellissimostipfnl.pdf,
http://www.ftc.gov/os/caselist/centurion/070919centurion-andreopoulosstipfinl.pdf,
http://www.ftc.gov/os/caselist/centurion/071022centurfinanmarchewkastipfnl.pdf,
http://www.ftc.gov/os/caselist/centurion/070525centurionhouttinstipfnl.pdf,
http://www.ftc.gov/os/caselist/centurion/070425centurionstipfnlcholette.pdf,
http://www.ftc.gov/os/caselist/centurion/070424centurionstipfnlmarchese.pdf, and
http://www.ftc.gov/os/caselist/centurion/070525centurionhouttinstipfnl.pdf.

27) FTC v. Del Sol LLC, *et al.*, No. CV 05-3013 GAF (RCx) (C.D. Cal. filed Dec. 8, 2005). The permanent injunction, entered on December 6, 2006, is available at http://www.ftc.gov/os/caselist/0523020/061206delsolstipfinal.pdf.

28) United States v. DirecTV, *et al.*, No. SA CV 05-1211 DOC (ANx) (C.D. Cal. filed Dec. 12, 2005). Stipulated permanent injunctions against Global Satellite, et al. and D.R.D., Inc., *et al.*, entered on December 11, 2006, are available at http://www.ftc.gov/opa/2006/12/directv.shtm.

29) In the DNCIA, the registration expiration date was five years from the date of the most recent registration; the 2007 DNCIA included a provision eliminating the automatic removal of registered numbers.

NATIONAL
DO NOT CALL
REGISTRY

FEDERAL TRADE COMMISSION	ftc.gov
1-877-FTC-HELP	FOR THE CONSUMER