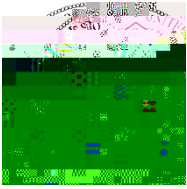


UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580



Division of Marketing Practices

April 15, 2008

Ms. Kristen Marshall
Copilevitz & Canter, LLC
310 W. 20th Street, Ste. 300
Kansas City, Mo. 64108

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- (i) the seller or telemarketer employs technology that ensures abandonment of no more than three (3) percent of all calls answered by a person, measured per day per calling campaign;
- (ii) the seller or telemarketer, for each telemarketing call placed, allows the telephone to ring for at least fifteen (15) seconds or four (4) rings before disconnecting an unanswered call;
- (iii) whenever a sales representative is not available to speak with the person answering the call within two (2) seconds after the person's completed greeting, the seller or telemarketer promptly plays a recorded message that states the name and telephone number of the seller on whose behalf the call was placed; and
- (i) the seller or telemarketer, in accordance with §310.5(b)-(d), ***retains records establishing compliance with §310.4(b)(4)(i)-(iii).***

[Emphasis added.]

