

CHAMBER OF COMMERCE  
OF THE  
UNITED STATES OF AMERICA

R. BRUCE JOSTEN  
EXECUTIVE VICE PRESIDENT  
GOVERNMENT AFFAIRS

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July 20, 2010

Federal Trade Commission, Office of the Secretary  
Room H-135 (Annex T)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

**Re: Telemarketing Sales Rule-Debt Relief Amendments-R411001**

Dear Commissioners:

The Chamber of Commerce, the world's largest business federation representing the interests of more than three million businesses and organizations of every size, sector, and region, appreciates the Commission evaluating the "no upfront fee" provision of the Telemarketing Sales Rule notice of proposed rulemaking on debt relief. If this amendment is included in the final rule in its current form, the Chamber believes it could have serious and unintended consequences on consumers and it may threaten the viability of the debt settlement industry due to unreasonable fee restrictions.

This amendment could harm more than 500,000 consumers who are working toward debt-relief in debt settlement programs.

It is important that debt settlement, as one of the most immediate forms of debt relief available, remain available to consumers. Debt settlement is the only bankruptcy alternative that allows consumers to satisfy outstanding obligations while paying less than the full amount of their unpaid balances. It serves as an important market niche between credit counseling and bankruptcy, a debt relief option that significantly impairs consumers' credit scores.

There is no question that sensible regulation of the debt relief industry is long overdue; however, if regulation is allowed to impair the ability of debt settlement companies to earn sufficient revenues to cover their operating expenses and provide a return to investors, the industry would disappear and American consumers burdened with debt would be forced to turn to bankruptcy.

With so many American households on the brink of being overwhelmed by debt, fair and balanced debt management options are crucial. The Chamber urges you to carefully consider the impact this amendment will have on consumers, on their options for debt management services and on an industry that employs 30,000 Americans across the country.

Sincerely,



R. Bruce Josten