

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Get-Aways, Inc.)	File No. ENF-99-TC-001
)	
Apparent Liability for Forfeiture)	NAL/Acct. No. X3217-001

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: December 15, 1999; Released: December 15, 1999

By the Commission:

I. INTRODUCTION

1. By this Notice of Apparent Liability for Forfeiture (NAL), we find that Get-Aways, Inc. (Get-Aways)¹ apparently willfully or repeatedly violated section 227 of the Communications Act of 1934, as amended (Act), and the Commission's rules and orders, by sending unsolicited advertisements to telephone facsimile machines.² Based on the facts and circumstances surrounding these apparent violations, we find that Get-Aways is apparently liable for a forfeiture in the amount of \$4,500 for each of the 19 unsolicited advertisements sent to telephone facsimile machines, resulting in a total forfeiture amount of \$85,500.

¹ Get-Aways, Inc., a/k/a GetAways Travel Services and GetAways Travel Network, is headquartered at 400 Mobile Avenue, Suite B-9, Camarillo, California 93010. According to Dun & Bradstreet Business Information Report, Get-Aways, a California corporation, began operations in 1986 and serves as a travel agency. The president of Get-Aways owns 100% of capital stock. Get-Aways employs four people, including its officers. See Dun & Bradstreet Business Information Report, Sept. 10, 1999.

² See 47 U.S.C. § 227; 47 C.F.R. § 64.1200(a)(3); see also *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Report and Order*, 7 FCC Rcd 8752, 8779, para. 54 (stating that section 227 of the Act prohibits the use of telephone facsimile machines to send unsolicited advertisements) (*TCPA Report and Order*). See also 47 U.S.C. § 503(b)(1). The Commission has the authority under this section of the Act to assess a forfeiture against any person who has "willfully or repeatedly failed to comply with any of the provisions of this Act or of any rule, regulation, or order issued by the Commission under this Act . . ." See also 47 U.S.C. § 503(b)(5) (stating that the Commission has the authority under this section of the Act to assess a forfeiture penalty against any person who is not a common carrier so long as (A) such person is first issued a citation of the violation charged; (B) is given a reasonable opportunity for a personal interview with an official of the Commission, at the field office of the Commission nearest to the person's place of resident; and (C) subsequently engages in conduct of the type described in the citation.). A party need not have known that it was acting unlawfully to support a finding of willfulness under section 503(b) of the Act. That section requires only a showing that the party knew it was doing the acts in question. See *Southern California Broadcasting Co.*, 6 FCC Rcd 4387 (1991).

II. BACKGROUND

2. On July 12, 1999, in response to several consumer letters indicating that Get-Aways faxed unsolicited advertisements to consumers' telephone facsimile machines, the Enforcement Division of the Common Carrier Bureau (Division) issued a citation to Get-Aways, pursuant to section 503 of the Act.³ Specifically, the Division cited Get-Aways for allegedly using a telephone facsimile machine, computer, or other device, to send an unsolicited advertisement to another telephone facsimile machine, in violation of section 227 of the Act and the Commission's rules and orders.⁴ The citation, which was served by certified mail, return receipt requested, informed Get-Aways that subsequent violations could result in the imposition of monetary forfeitures of up to \$11,000 per violation and included copies of six consumer letters that formed the basis for the citation.⁵ The citation informed Get-Aways that it could request a personal interview at the nearest Commission field office within 21 days of the date of the citation, or could provide a written statement responding to the citation within 21 days. The Commission received the signed return receipt card from Get-Aways on July 22, 1999, indicating that Get-Aways received the citation on July 19, 1999.⁶ Get-Aways neither requested a personal interview nor provided a written response after receiving the citation.

3. Despite the citation's warning that subsequent violations could result in the imposition of monetary forfeitures, the record indicates that Get-Aways continued to fax

³ See 47 U.S.C. § 503(b)(5) (authorizing the Commission to issue citations to non-common carriers for violations of the Act or of the Commission's rules and orders).

⁴ See 47 U.S.C. § 227. For simplicity, this order will use the term "telephone facsimile machine" to incorporate by reference, a telephone facsimile machine, computer, or other device as those terms are used in section 227(b)(1)(C), 47 U.S.C. § 227(b)(1)(C). See also 47 C.F.R. § 64.1200(a)(3) (stating in pertinent part that no person may "[u]se a telephone facsimile machine, computer, or other device to send an unsolicited advertisement to a telephone facsimile machine.").

⁵ The following consumer letters requesting Commission action were attached to the citation: (1) Clarkson Conceptual Planning, Inc. (CCPI), Request for Commission Action, IC-99-07095 (May 3, 1999) (stating that CCPI received two unsolicited advertisements via facsimile from Get-Aways in May); (2) A.O. Smith Water Products, Request for Commission Action, IC-99-07089 (Apr. 26, 1999) (stating that A.O. Smith Water Products received a facsimile that contained an unsolicited advertisement from Get-Aways on April 19, 1999); (3) Selection Resource Inc., Request for Commission Action, IC-99-07098 (May 3, 1999) (stating that SRI received an unsolicited advertisement via fax on February 21, 1999 and again April 14, 1999); (4) Daniel K. Moller Law Offices, Request for Commission Action, IC-99-07099 (Apr. 20, 1999) (stating that her office received an unsolicited advertisement via fax from Get-Aways on April 4, 1999 and again on April 20, 1999); (5) Davern, McLeod & Pezalla, Request for Commission Action, IC-99-07094 (Mar. 25, 1999) (stating that his office received an unsolicited advertisement via fax from Get-Aways on March 24, 1999); and (6) Gulf Star Realty (GSR), Request for Commission Action, IC-99-07092 (June 8, 1999) (stating that GSR received an unsolicited advertisement via fax from Get-Aways on March 29, 1999).

⁶ Each unsolicited facsimile advertisement provided an address at which Get-Aways could be reached. This address was verified by Dun & Bradstreet reports and by Commission staff. See *supra* note 1.

unsolicited advertisements in violation of the Act and of the Commission's rules and orders. Specifically, after issuing the citation, the Commission received several consumer letters stating that Get-Aways continued to engage in such conduct.⁷ Our action here is based on consumer letters sent to the Commission alleging that Get-Aways sent unsolicited advertisements to telephone facsimile machines in violation of the Act and the Commission's rules and orders since July 19, 1999, the day Get-Aways received the Commission's citation.⁸

III. THE CONSUMER LETTERS

4. The Clarkson Conceptual Planning, Inc. Letter. Mr. Peter Clarkson, owner of Clarkson Conceptual Planning, Inc. (CCPI), asserts that Get-Aways faxed two unsolicited advertisements to CCPI in May 1999.⁹ Mr. Clarkson stated that each fax offered an identical vacation package to Florida. On August 26, 1999, after receiving two additional unsolicited facsimile advertisements from Get-Aways, Mr. Clarkson sent a letter requesting Commission action.¹⁰ Mr. Clarkson states that on August 19, 1999, he telephoned Get-Aways and requested that it stop sending these faxes. Despite his request, Get-Aways sent CCPI another unsolicited

⁷ See (1) Refugee and Immigration Services (RAIS), Request for Commission Action, IC No. 99-08155 (Aug. 26, 1999) (stating that RAIS received unsolicited facsimile advertisements from Get-Aways on August 24, 1999 and again in September 22, 1999); (2) Duo Graphics, Request for Commission Action, IC No. 99-08153 (Aug. 26, 1999) (stating that Duo Graphics received an unsolicited advertisement by fax from Get-Aways on August 25, 1999); (3) Incon Research, Request for Commission Action, IC No. 99-08148 (Sept. 1, 1999) (stating that Get-Aways used a telephone facsimile machine to send unsolicited advertisements to Incon Research on September 1; September 2; and September 9, 1999); (4) Knowledge Systems Inc, Request for Commission Action, IC No. 99-08149 (Sept. 8, 1999) (stating that Get-Aways faxed unsolicited advertisements to Knowledge Systems on August 27, 1999); Declaration of John Koch, Knowledge Systems Inc. (Oct. 22, 1999) (stating that KSI also received an unsolicited advertisement via fax on September 28, 1999); (5) Declaration of Dorothy Thieneman, Gulf Star Realty (Sept. 24, 1999) (stating that Gulf Star Realty received unsolicited facsimile advertisements from Get-Aways on: August 25; August 27; September 15; and September 16, 1999); (6) Clarkson Conceptual Planning, Inc. (CCPI), Request for Commission Action, IC No. 99-08154 (Aug. 26, 1999) (stating that CCPI received unsolicited advertisements by facsimile from Get-Aways on August 11 and August 25, 1999); (7) Partrick Insurance Agency, Request for Commission Action, IC No. 99-08151 (Oct. 8, 1999) (stating that Partrick Insurance Agency received unsolicited facsimile advertisements from Get-Aways on: August 11; August 26; October 4; and October 21, 1999); and (8) Davern, McLeod & Pezalla, Request for Commission Action, IC No. 99-08150 (stating that Davern, McLeod & Pezalla received an unsolicited facsimile advertisement from Get-Aways on August 23, 1999).

⁸ For purposes of completing this enforcement action, the Commission established a cut-off date of November 1, 1999, for reviewing consumer letters received against Get-Aways. Thus, this NAL is based on those consumer letters processed between July 19, 1999—the date Get-Aways received the Commission's citation—and November 1, 1999. We note that consumer letters received after November 1, 1999 complaining of unlawful conduct by Get-Aways may form the basis of subsequent enforcement action, if appropriate.

⁹ See Clarkson Conceptual Planning, Inc., Request for Commission Action, IC No. 99-07095 (May 26, 1999).

¹⁰ See Declaration of Peter Clarkson, Clarkson Conceptual Planning, Inc. at para. 2. (Sept. 22, 1999).

facsimile advertisement on August 25, 1999.¹¹ Mr. Clarkson states that at no time did he or anyone at CCPI give Get-Aways permission or invitation to send these faxes. Mr. Clarkson further states that CCPI does not have an established business relationship with Get-Aways.¹²

5. The Incon Research Letter. On September 1, 1999, Mr. Roth, principal of Incon Research, filed a letter requesting Commission action and stating that Get-Aways faxed an unsolicited advertisement to Incon Research on September 1, 1999, offering a “New Disney Daytona Adventure Getaway pkg.”¹³ On September 2, 1999, Incon Research received an identical unsolicited facsimile advertisement from Get-Aways. Mr. Roth states that after receiving the fax on September 2, 1999, he contacted Get-Aways to inquire why it sent the advertisement. Mr. Roth states that Get-Aways terminated the telephone call without providing a response.¹⁴ Mr. Roth also states that Incon Research received an unsolicited advertisement via fax on September 9, 1999. Mr. Roth further states that neither he nor anyone else at Incon Research ever gave Get-Aways permission to send advertisements to Incon’s fax machine. Mr. Roth further states that he does not have a prior business relationship with Get-Aways.

6. The Gulf Star Realty Letter. On June 11, 1999, Ms. Dorothy Thieneman, Co-Owner of Gulf Star Realty (GSR), filed a letter requesting Commission action, asserting that Get-Aways faxed unsolicited advertisements to GSR on several occasions.¹⁵ In her statement supporting her complaint, Ms. Thieneman states that she contacted Get-Aways on several occasions both by phone and by fax to request that GSR be removed from Get-Aways distribution list.¹⁶ Ms. Thieneman states that despite these requests, Get-Aways continued to fax unsolicited advertisements to GSR. In particular, even after receiving the citation on July 19, 1999, Get-Aways faxed several additional unsolicited advertisements to GSR on the following dates: (1) August 27, 1999; (2) September 15, 1999; and (3) September 16, 1999.¹⁷ Ms. Thieneman states that neither she nor anyone else at GSR authorized Get-Aways to send these faxes. Ms. Thieneman further states that GSR does not have an established business relationship with Get-Aways.

¹¹ See *id.* at para. 5 (CCPI also received an unsolicited facsimile advertisement from Get-Aways on August 11, 1999.).

¹² See *id.*

¹³ See Incon Research, Request for Commission Action, IC No. 99-08148 (Sept. 1, 1999).

¹⁴ See Declaration of Martin P. Roth, Principal, Incon Research, Inc., IC No. 99-08148 (Sept. 16, 1999).

¹⁵ See Declaration of Dorothy Thieneman, Gulf Star Realty at para. 2 (Sept. 24, 1999) (stating that Gulf Star Realty received unsolicited facsimile advertisements from Get-Aways prior to the Commission issuing the citation on: April 27, 1998; July 25, 1998; and March 29, 1999).

¹⁶ See *id.* at para. 5.

¹⁷ See *id.* at para. 3.

7. The remaining consumer letters. The remaining consumer letters supporting this NAL are factually similar to the allegations in the consumer letters described above.¹⁸ In each case, the consumer states that Get-Aways used a telephone facsimile machine to send an unsolicited advertisement to the consumer's telephone facsimile machine. The majority of the consumers attempted to contact Get-Aways to put a stop to the unsolicited facsimile advertisements, but were unsuccessful.¹⁹ For example, at least one consumer states that the Get-Aways representative terminated the call in mid-conversation.²⁰ In other instances, consumers requested that Get-Aways remove their fax number from Get-Aways distribution list, but continued to receive the unsolicited facsimile advertisements.²¹

IV. DISCUSSION

A. Violations Evidenced in the Letters.

8. The letters described above appear to establish a disturbing pattern of disregard for the requirements of the Act and of the Commission's rules and orders. Section 227(b)(1)(B) of the Act prohibits any person from using "a telephone facsimile machine, computer, or other device to send an unsolicited advertisement to a telephone facsimile machine."²² In enacting section 227 of the Act, Congress gave the Commission jurisdiction to promulgate rules and regulations in accordance with the Act and the authority to enforce such rules and regulations.²³ Accordingly, mirroring the language in section 227, the Commission adopted section 64.1200(a)(3) of its rules, prohibiting any person from using a "telephone facsimile machine, computer, or other device to send an unsolicited advertisement to a telephone facsimile machine."²⁴ An unsolicited advertisement is defined as "any material advertising the

¹⁸ See *supra* note 7 (listing the consumer letters that form the basis for this NAL).

¹⁹ See, e.g., Declaration of Martin P. Roth at para. 3; Declaration of John Koch, Knowledge Systems Inc. at para. 3 (Oct. 22, 1999).

²⁰ See Declaration of Martin P. Roth at para. 3.

²¹ See, e.g., Declaration of Jim Partrick, Partrick Insurance Agency at para. 3 (Oct. 22, 1999); Declaration of Peter Clarkson, Clarkson Conceptual Planning, Inc. at para. 5 (Sept. 23, 1999).

²² 47 U.S.C. § 227(b)(1)(C). Section 227 defines a telephone facsimile machine as "equipment which has the capacity (A) to transcribe text or images, or both, from paper into an electronic signal and to transmit that signal over a regular telephone line, or (B) to transcribe text or images (or both) from an electronic signal received over a regular telephone line onto paper." 47 U.S.C. § 227(a)(2). This blanket prohibition applies to all unsolicited advertisements transmitted by telephone facsimile machines. The Act does not permit unsolicited advertisements by facsimile to either business or residential telephone facsimile machines.

²³ See *TCPA Report and Order*, 7 FCC Rcd at 8779 n.87 (stating that "[i]n banning unsolicited facsimile advertisements, the TCPA leaves the Commission without discretion to create exemptions from or limit the effects of the prohibition . . . thus, such transmissions are banned in our rules as they are in the TCPA.").

²⁴ 47 C.F.R. § 64.1200(a)(3).

commercial availability or quality of any property, goods, or services which is transmitted to any person without that person's prior express invitation or permission."²⁵ Each facsimile transmission upon which this NAL is based offers a similar "Disney Daytona Vacation Get-A-Way Pkg." The facsimile states, "your vacation begins with five days four nights in the vacation capital of the world." The packages are offered at either \$149 or \$198 per person. Get-Aways provides a number of ways in which to reserve a spot on the trip and states that a 5% discount will be given on all American Express and Discover purchases.²⁶ These facsimiles offer vacation packages for sale and thus clearly fall within the definition of an advertisement.

9. Moreover, these facsimile transmissions appear to be unsolicited, because Get-Aways appears to have sent each facsimile transmission without the prior express invitation or permission of the recipient. By definition, an unsolicited advertisement is an advertisement that "is transmitted to any person without that person's prior express invitation or permission."²⁷ In discussing when advertisements can be sent via facsimile, in the *TCPA Memorandum Opinion and Order*, the Commission explained that the "existence of an established business relationship establishes consent to receive telephone facsimile advertisement transmissions."²⁸ The Commission further stated, however, that the mere distribution or publication of a telephone facsimile number does not confer express invitation or permission to transmit advertisements to a particular telephone facsimile machine.²⁹

10. Record evidence indicates that none of the consumers at issue had an established business relationship with Get-Aways. For example, in his declaration in support of his complaint, Mr. Partrick of Partrick Insurance Agency, Mr. Clarkson of CCPI, and Mr. Roth of Incon Research all specifically state that his company does not have an established business relationship with Get-Aways,³⁰ and that they did not authorize Get-Aways to send these advertisements. Furthermore, evidence on the record indicates that Get-Aways continued to send faxes to companies that specifically had requested to be removed from Get-Aways'

²⁵ 47 C.F.R. § 64.1200(f)(5).

²⁶ See, e.g., Incon Research, Request for Commission Action, IC No. 99-08148 (Sept. 1, 1999) (attaching copies of the unsolicited advertisements it received from Get-Aways) (note: there are slight variations among the vacation packages offered in the unsolicited advertisement sent by Get-Aways).

²⁷ 47 U.S.C. § 227(a)(4).

²⁸ *TCPA Memorandum Opinion and Order*, 10 FCC Rcd at 12,408, para. 37.

²⁹ *Id.*

³⁰ See Declaration of Jim Partrick, Partrick Insurance Agency at para. 4; see also *supra* notes 10 & 12. Similarly, each of the consumer letters and supporting declarations that formed the basis of this NAL stated that he or she did not have a business relationship with Get-Aways. See *supra* note 8.

distribution list.³¹ Such evidence demonstrates that Get-Aways did not have prior express permission or invitation to send the facsimile transmissions.

B. Forfeiture Amount.

11. Get-Aways apparently willfully or repeatedly violated the Act and the Commission's rules and orders by using a telephone facsimile machine to send unsolicited advertisements to other telephone facsimile machines. Get-Aways apparently did not cease its unlawful conduct even after the Commission issued a citation warning that Get-Aways was engaging in unlawful conduct and could be subject to monetary forfeitures.³² Accordingly, a proposed forfeiture is warranted against Get-Aways for its apparent willful or repeated violations of section 227 of the Act and of the Commission's rules and orders regarding the faxing of unsolicited advertisements.

12. Section 503(b) of the Act authorizes the Commission to assess a forfeiture of up to \$11,000 for each violation of the Act or of any rule, regulation, or order issued by the Commission under the Act by a non-common carrier or other entity not specifically designated in section 503 of the Act.³³ In exercising such authority, we are to take into account "the nature, circumstances, extent, and gravity of the violation and, with respect to the violator, the degree of culpability, any history of prior offenses, ability to pay, and such other matters as justice may require."³⁴

13. Although the *Commission's Forfeiture Policy Statement* does not establish a base forfeiture amount for violating the prohibition on using a telephone facsimile machine to send unsolicited advertisements, the guidelines do state that ". . . any omission of a specific rule violation from the . . . [forfeiture guidelines] . . . should not signal that the Commission

³¹ See Declaration of Jim Partrick at para. 3; see also Declaration of Dorothy Thieneman, Gulf Star Realty at para. 5.

³² See *supra* para. 2 (stating that the Commission received the return receipt card indicating that Get-Aways received the citation); see also *supra* note 6 (stating that each Get-Aways' unsolicited facsimile address provided an address at which Get-Aways could be reached and that the Commission staff verified the address).

³³ Section 503(b)(2)(C) provides for forfeitures up to \$10,000 for each violation by cases not covered by subparagraphs (A) or (B), which address forfeitures for violations by licensees and common carriers, among others. See 47 U.S.C. § 503(b); 47 C.F.R. § 1.80. The Commission amended its rules by adding a new subsection to its monetary forfeiture provisions that incorporates by reference the inflation adjustment requirements contained in the Debt Collection Improvement Act of 1996 (Pub. L. 104-134, Sec. 31001, 110 Stat. 1321), enacted on April 26, 1996. Thus, the statutory maximum pursuant to section 503(b)(2)(C) increased from \$10,000 to \$11,000. See *Amendment of Section 1.80 of the Commission's Rules*, 12 FCC Rcd 1038 (1997).

³⁴ 47 U.S.C. § 503(b)(2)(D); *Commission's Forfeiture Policy Statement and Amendment of Section 1.80 of the Rules to Incorporate the Forfeiture Guidelines, Report and Order*, 12 FCC Rcd at 17,087, 17,100-01, para. 27 (1997).

considers any unlisted violation as nonexistent or unimportant.”³⁵ The Commission retains the discretion, moreover, to depart from the guidelines and issue forfeitures on a case-by-case basis, under its general forfeiture authority contained in section 503 of the Act.³⁶

14. A company’s practice of using a telephone facsimile machine to send unsolicited advertisements to a telephone facsimile machine, in particular after being warned by the Commission that such conduct violates the Act and the Commission’s rules and orders, demonstrates a blatant disregard for the Act and the Commission’s rules and orders. The Division’s July 12, 1999 citation specifically warned Get-Aways that its conduct appeared to be unlawful. Despite this citation, Get-Aways continued to fax unsolicited advertisements in violation of the Act and the Commission’s rules and orders.

15. In addition, Get-Aways’ conduct has caused consumers to incur costs. In prohibiting unsolicited advertisements by fax, Congress noted that a consumer who has received an unsolicited advertisement via fax bears the costs of advertising that should be borne by the sender.³⁷ Recipients of fax advertisements assume the cost of the paper used, and the cost associated with the recipient’s inability to send or receive faxes when its machine is tied up with the unsolicited advertisement.³⁸

16. Each of the 19 unsolicited faxes constitute a separate violation. Applying the criteria outlined in the Commission’s forfeiture guidelines, and weighing the facts before us, including the fact that Get-Aways continued its unlawful conduct after a warning by the Commission, we propose to assess a forfeiture in the amount of \$4,500 for each of the 19 violations. We find that this amount is appropriate, in part, because it balances the interests of protecting consumers and deterring subsequent violations of the Act against the potentially legitimate interest of companies. This results in a total forfeiture of \$85,500. Get-Aways shall have the opportunity to submit evidence and arguments in response to this NAL to show that no forfeiture should be imposed or that some lesser amount should be assessed.³⁹

V. CONCLUSION AND ORDERING CLAUSES

17. We have determined that Get-Aways apparently violated section 227 of the Act and the Commission’s rules and orders by using a telephone facsimile machine, computer, or other

³⁵ *Id.* at 17,099, para. 22.

³⁶ *Id.*

³⁷ *See Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Memorandum Opinion and Order*, 10 FCC Rcd 12,391, 12,405, para. 29 (1995) (*TCPA Memorandum Opinion and Order*) (citing H.R. Report No. 317, 102nd Cong. 25 (1991)).

³⁸ *See id.*

³⁹ *See* 47 U.S.C. § 503(b)(4)(C); 47 C.F.R. § 1.80(f)(3).

device to send 19 unsolicited advertisements to the eight consumers identified above. We have further determined that Get-Aways is apparently liable for forfeitures in the amount of \$4,500 for each such violation resulting in a total forfeiture amount of \$85,500.

18. Accordingly, IT IS ORDERED, pursuant to section 503(b) of the Act, as amended, 47 U.S.C. § 503(b)(5), section 1.80 of the Commission's rules, 47 C.F.R. § 1.80, that Get-Aways, Inc. IS HEREBY NOTIFIED of an Apparent Liability for Forfeiture in the amount of \$85,500 for willful or repeated violations of section 227 of the Act and the Commission's rules and orders in the paragraphs described above.

19. IT IS FURTHER ORDERED, pursuant to section 1.80 of the Commission's rules, 47 C.F.R. § 1.80, that within thirty (30) days of the release of this Notice, Get-Aways, Inc. SHALL PAY the full amount of the proposed forfeiture⁴⁰ OR SHALL FILE a response showing why the proposed forfeiture should not be imposed or should be reduced.

20. IT IS FURTHER ORDERED that a copy of this Notice of Apparent Liability for Forfeiture SHALL BE SENT by certified mail to Timothy F. Deinhard, President, Get-Aways, Inc., 400 Mobile Avenue, Suite D-11, Camarillo, California 93011.

FEDERAL COMMUNICATIONS COMMISSION

Magalie Roman Salas
Secretary

⁴⁰ The forfeiture amount should be paid by check or money order drawn to the order of the Federal Communications Commission. Reference should be made on Get-Aways, Inc.'s check or money order to "NAL/Acct/ No. X3217-001." Such remittances must be mailed to Forfeiture Collection section, Finance Branch, Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.