

Compliance Policy

Regarding The Telephone Consumer Protection Act (and Do Not Call List)

Regulatory Summary

The federal Telephone Consumer Protection Act (TCPA) and related FCC regulations shield consumers from unwanted telemarketing. The TCPA defines telemarketing as the initiation of a telephone call or fax for the purpose of encouraging the purchase or investment in property, goods or services, which is transmitted to any prospective customer at a residence. The TCPA governs cold calls, prerecorded sales calls, and the use of auto-dialers, fax machines and other telemarketing strategies.

The TCPA mandates that telemarketers:

- Maintain a Do Not Call Policy
- Promptly provide a copy of the Policy to requesting consumers
- Only make calls between 8 a.m. and 9 p.m. (local time of the person being called)
- Identify the caller name, company name and caller location
- Maintain and comply with a company “do not call” list derived from the federal “do not call” registry
- Honor a consumer’s request made during a call to place the consumer’s name on the “do not call” list
- Transmit caller ID information
- Not abandon outbound calls

The Michigan Home Solicitation Sales Act (MHSSA) establishes similar telemarketing restrictions and adopts the federal do not call registry. With respect to calls made to Michigan residents, the MHSSA does not apply to “a sale or solicitation of insurance by an insurance agent licensed by the commissioner of insurance.” To the extent applicable, this exemption controls over the TCPA. Frankenmuth Mutual Insurance Company and its subsidiaries including but not limited to the following: (Patriot Insurance Company, Patriot Life Insurance Company and Ansur America Insurance Company) and independent agents marketing our products outside Michigan should identify and comply with similar laws of the relevant state.

General Statement of Policy

Frankenmuth Mutual Insurance Company and its subsidiaries including but not limited to the following: (Patriot Insurance Company, Patriot Life Insurance Company and Ansur America Insurance Company) do not engage in telemarketing. Any employee considering telemarketing must first consult with the executive responsible for legal affairs on appropriate procedures adhering to the TCPA and applicable state laws.

Independent agencies conducting telemarketing in specific reference to a product or marketing initiative of Frankenmuth Mutual Insurance Company or any subsidiary shall fully adhere to the TCPA and applicable state laws.

There are strict penalties for noncompliance with the TCPA, MHSSA and similar state laws. Violations may subject an agent or employee to such penalties, as well as contract termination, employment termination and other discipline.

For More Information

To learn more about the TCPA and applicable state laws, you may visit the web site listed below.

FCC web page: <http://www.fcc.gov/cgb/consumerfacts/tpca.html>