



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
HEADQUARTERS UNITED STATES ARMY INFANTRY CENTER  
FORT BENNING, GEORGIA 31905-5000

Policy Memorandum 210-7-7

IMSE-BEN-MW (210)

21 May 2007

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Commercial Solicitation on Fort Benning

1. REFERENCES:

- a. Department of Defense Instruction (DoDI) 1344.7, Personal Commercial Solicitation on DoD Installations, 30 March 2006.
- b. Army Regulation 210-7, Commercial Solicitation on Army Installations, 22 April 1986.
- c. Army Regulation 608-1, Army Community Service Center, 6 December 2006.
- d. Army Regulation 215-1, Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities, 24 October 2006.
- e. AR 600-20, Fund Raising Within the Department of the Army 1 June 2001.
- f. USAIC Supplement 1 to AR 210-7, Commercial Solicitation on Army Installations, 8 July 2002.
- g. Fort Benning Policy Memorandum 600-29-4, Fund Raising Activities on Fort Benning, 10 January 2006.

2. PURPOSE: To establish standards concerning solicitation practices on Fort Benning.

3. GENERAL: DoDI 1344.7 and Army Regulation 210-7 regulate the conduct of commercial solicitation on Army installations. These rules are designed to ensure solicitation practices comply with ethical and legal prohibitions.

4. POLICY:

- a. Any commercial solicitation on Fort Benning must comply with the terms of the above references and this memorandum. Commanders at all levels will become familiar with these terms and enforce the same within their unit areas.
- b. The enclosed Fact Sheet details guidance and the more important prohibitions which are of immediate concern. In addition, the following standards will be met:

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(1) Commercial solicitation of any type will not be permitted in any training unit or at any training location or training event, to specifically include unit barracks. This prohibition includes, but is not limited to, the following units/schools: 198th IN Bde, 192d IN Bde, OCS, NCOA, BOLC, and Maneuver Captains Career Course. Soldiers are at Fort Benning to train and need to focus on that task without the distraction of being solicited to purchase products and services.

(2) Commander/Commandants of training units will ensure that all assigned cadre personnel are aware of the restrictions on solicitation. Instruction on these restrictions will be provided to cadre members upon arrival at a training unit and on an annual basis thereafter.

(3) All personnel engaged in solicitation on Fort Benning must be approved by DMWR. Effective immediately, DMWR will establish and maintain a list of those companies/agents issued solicitation permits IAW AR 210-7. This list will be updated and published as required and given widest possible distribution. Individuals seeking permit on behalf of themselves or a company will be required to acknowledge, in writing, that they have read and understand both AR 210-7 and this Policy Memorandum. Individuals found in violation of their permits will be reported to DMWR and the Military Police.

(4) Compliance with the provisions of this Policy Memorandum will be a matter of command interest and subject to review by the Inspector General's office.

c. This prohibition does not include those events sponsored by Family Support Groups which have been approved in accordance with Fort Benning Policy Memorandum 600-29-4 or to those events sponsored by DMWR.

d. Concessionaire contracts issued by either DMWR or AAFES will reference both this Policy Memorandum and the applicable portions of AR 210-7. While approved concessionaires may have access to unit personnel for the limited purpose of taking unit pictures or other necessary actions to prepare/manufacture items for sale, the sale of these items will not occur in unit areas but will be limited to the serving AAFES/DMWR facility.

e. With appropriate disclaimers and at the express request of the installation commander, representatives of and materials provided by credit unions and banks located on military installations may be used to provide educational programs and information IAW DoD Directive 1000.11, Financial Institutions on DoD Installations.

f. All personnel will comply with the requirements contained in the enclosed fact sheet.

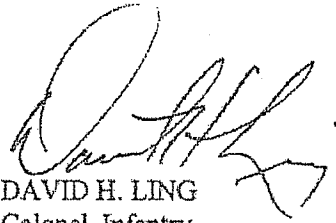
5. SUPERSESSION: This policy memorandum supersedes USAIC Policy Memorandum 210-7-5, 24 January 2005, same subject.

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6. PROPONENT: Directorate of Morale, Welfare and Recreation, 545-1511.

FOR THE COMMANDER:



DAVID H. LING  
Colonel, Infantry  
Chief of Staff

Encl

DISTRIBUTION:  
Dir's/Admin Lists

FACT SHEET

MR. GELINEAU  
IMSE-BEN-MW/545-1511  
16 MAY 2007

SUBJECT: Commercial Solicitation, Educational Services and Prohibited Solicitation Practices

FACTS:

1. PURPOSE: To provide commanders guidance regarding the standards for commercial solicitation and educational services.

2. MAJOR POINTS:

a. Life Insurance Solicitation Standards.

- (1) All insurance business conducted on the installation will be by appointment.
- (2) DoD personnel are expressly prohibited from representing any insurance company or dealing either directly or indirectly with any insurance company as an agent.
- (3) No civilian agent may be designated as the Battalion Insurance Advisor, Unit Insurance Counselor, SGLI Conversion Consultant, or similar titles.
- (4) Solicitation of Soldiers in the grade of E-1 thru E-3 who are not attending schools (IET, OSUT, OCS, NCOA, BOLC, MCCC, Airborne, or Ranger) is restricted to specified times and locations designated by the installation commander. In accordance with AR 210-7, Chapter 3-3b and 3-10, Soldiers will report their desire to purchase insurance to their chain of command. Those Soldiers desiring to purchase insurance will receive counseling by the unit and will be required to wait a minimum of 7 days before the unit will process the allotment forms. (See AR 210-7, Chapter 3-3b.)

b. Education Services.

- (1) With appropriate disclaimers and at the express request of the installation commander, representatives of and materials provided by credit unions and banks located on military installations may be used to provide educational programs and information.
- (2) Other commercial agents, including representatives of loan, finance, insurance or investment companies, will not be used to provide educational programs and information regarding personal financial affairs.

c. Prohibited Practices.

- (1) Solicitation during enlistment or induction processing or during basic combat training, and within the first half of the one station unit training cycle.
- (2) Solicitation of mass, group, or captive audiences.
- (3) Making appointments with or soliciting of military personnel who are on-duty.
- (4) Soliciting without an appointment in areas used for housing or processing transient personnel, or soliciting in barracks areas used as quarters.

(5) Use of official identification cards by retired or Reserve members of the Armed Forces to gain access to military installations to solicit.

(6) Offering false, unfair, improper, or deceptive inducements to purchase or trade.

(7) Offering rebates to promote transactions or to eliminate competition. (Credit union interest refunds to borrowers are not considered a prohibited rebate.)

(8) Use of any manipulative, deceptive, or fraudulent device, scheme, or artifice, including misleading advertising and sales literature.

(9) Any oral or written representations which suggest or appear that DA sponsors or endorses the company or its agents, or the goods, services, and commodities offered for sale. Commanders and other military personnel must avoid the appearance that they endorse or support the activity.

(10) Personal commercial solicitation by an active duty member of junior member, at any time, on or off the installation (i.e., recurring sales of property, investments, and other services). This does not apply to those situations in which a Soldier is working as a sales person at a retail establishment.

(11) Entry into any unauthorized or restricted area.

(12) Assignment of desk space for interviews, except for specific, prearranged appointments. During appointments, the agent must not display desk or other signs announcing the name of the company or product affiliation.

(13) Use of a bulletin or any other notice, official or unofficial, announcing the presence of an agent and his availability.

(14) Distribution of literature other than to the person being interviewed.

(15) Offering of a financial benefit or other valuable or desirable favors to military or civilian personnel to help or encourage sales transactions. This does not include advertising material for prospective purchasers (such as pens, pencils, wallets, and notebooks, normally with a value of \$1 or less).

(16) Use of any portion of installation facilities, to include quarters, as a showroom or store for the sale of goods or services, except as specifically authorized by regulations governing the operations of exchanges, commissaries, nonappropriated fund instrumentalities, and private organizations. This is not intended to preclude normal home enterprises, providing compliance with State and local laws.

(17) Advertisements citing addresses or telephone numbers of commercial sales activities conducted on the installation.

d. Commercial Sponsorship Program. IAW AR 215-1, para 7-47, commercial sponsorship of various events by businesses is permitted only for MWR programs and events, AFTB and Army Family Action Plan, under commercial sponsorship program. While permissible to acknowledge sponsorship, sponsorship does not void or abrogate the guidance contained herein. Special concessions or favored treatment are not provided to commercial sponsors.

(1) Commercial Sponsorship Program will be either unsolicited or solicited but authorized only for MWR programs and events and the NAF component of Army Community Service (AR 608-1), to include Army Family Team Building (AR 608-48) and Army Family Action Plan (AR 608-47), which are closely associated with MWR programs.

(2) The Commercial Solicitation Program does not include acceptance of volunteer services. Additionally, this program does not include nor refer to those products or services considered gifts or donations. MWR gifts policy is contained in AR 215-1, Chap 13.

(3) Military open house programs are primarily PAO activities and are not intended in MWR events. Therefore, commercial sponsorship is not authorized for military open house programs. Commercial sponsorship is authorized for MWR events held in conjunction with open houses only when specifically approved by the installation PAO.

c. Commanders should coordinate all commercial solicitation and educational service programs with their SJA and DMWR (ACS coordinator).

AUTHENTICATED BY: 

5/2/07