FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 947

Date Filmed 3-26-81 Camera No. --- 2

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PS Form 3811, Jan. 1988 — RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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MVR 947

☆GPO : 1978-[illegible]

MUR 947

FEDERAL ELECTION COMMISSION

See items 1-26 on attached sheet.

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
1-26	(3) Exempted by other statute 2 U.S.C. § 437g(a)(4)(B)(i)	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
20	(5) Internal Documents Deliberative material 5 U.S.C. § 552(b)(5)		

Signed Vincent J Lonsberg Jr

date 3-4-81

FEC 9-21-77

Memo To: File - MVR 947
From: Vincent J. Conway, Jr., 3/4/81
Subject: Deletions from public record, MVR 947

1. Memo from Office of Cmsn Sec'y (OCS) to C.N. Steele, 2-19-81
2. 48 hour tally sheet, 2-18-81
3. Memo from E.T. Garr to OCS, 2-17-81
4. Memo from C.N. Steele to Cmsn, 2-17-81
5. Ltr from S.S. Lewis to C.N. Steele, 1-13-81
6. Memo from OCS to C.N. Steele, 1-7-81
7. Memo from E.T. Garr to OCS, 12-22-80
8. Interim Conciliation Rpt #2, 12-22-80
9. Ltr from C.N. Steele to S.S. Lewis, 10-31-80
10. Certification of Cmsn action, 10-28-80
11. Memo from OCS to C.N. Steele, 10-23-80
12. 48 hour tally sheet, 10-23-80
13. Memo from E.T. Garr to OCS, 10-20-80
14. Memo from C.N. Steele to Cmsn, 10-20-80
15. Memo from OCS to C.N. Steele, 10-1-80
16. Interim Conciliation Rpt #1, 9-24-80
17. Ltr from S.S. Lewis to C.N. Steele, 9-15-80
18. Ltr from S.S. Lewis to C.N. Steele, 8-27-80
19. Ltr from C.N. Steele to S.S. Lewis, 7-28-80
20. Certification of Cmsn action, 7-25-80
21. Memo from OCS to C.N. Steele, 7-10-80
22. 48 hour tally sheet, 7-8-80
23. Memo from OCS to C.N. Steele, 7-7-80
24. Memo from J. Colgrove to OCS, 7-3-80
25. Memo from C.N. Steele to Cmsn, 7-3-80
26. Ltr from S.S. Lewis to T.J. Whitehead, 5-14-80

- end -

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 26, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glenn E. Watts
President
Communications Workers of America
1925 K Street, N.W.
Washington, D.C. 20006

Re: MUR 947

Dear Mr. Watts:

This is to advise you of the action taken by the Commission in connection with the complaint, dated April 9, 1979, by which you alleged that the American Telephone and Telegraph Company had violated the Federal Election Campaign Act of 1971, as amended.

On June 5, 1979, the Commission found reason to believe that AT&T had violated 2 U.S.C. §441b(b)(6). Pursuant to 11 C.F.R. §111.18(d), on February 19, 1981, the Commission voted to enter into a conciliation agreement with AT&T and to close its file in this matter. A copy of the conciliation agreement is enclosed for your information.

Sincerely,

Charles N. Steele
General Counsel

VJC
2/24/81

Enclosure

R (947) 1994 ✓

SENDER: Complete items 1, 2, and 3.
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2. ARTICLE ADDRESSED TO:
Susan S. Lewis, Esq.
AT&T
Washington, DC 20036

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	912346	

(Always obtain signature of addressee or agent)

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Form 3811, Jan. 1979

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GPO : 1979-[illegible]
2-27-81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 20, 1981

Susan S. Lewis, Esq.
American Telephone and
Telegraph Company
Suite 1000
1120 20th Street, Northwest
Washington, D. C. 20036

Dear Ms. Lewis:

This will acknowledge receipt of the proposed conciliation agreements which you submitted in behalf of American Telephone and Telegraph Company and Sandia Laboratories by letters dated January 13 and 26, 1981.

The Commission has considered those agreements and has voted to accept them. I am enclosing a signed copy of each conciliation agreement for your files. I note that Sandia must implement and comply with the terms of its agreement within thirty days.

Pursuant to 2 U.S.C. §437g(a)(4)(B)(i), no action by the Commission or any person, and no information derived, in connection with the conciliation of this matter will be made public without written consent of the respondents.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Susan S. Lewis, Esq.
American Telephone and
Telegraph Company
Suite 1000
1120 20th Street, Northwest
Washington, D. C. 20036

Dear Ms. Lewis:

This will acknowledge receipt of the proposed conciliation agreements which you submitted in behalf of American Telephone and Telegraph Company and Sandia Laboratories by letters dated January 13 and 26, 1981.

The Commission has considered those agreements and has voted to accept them. I am enclosing a signed copy of each conciliation agreement for your files. I note that Sandia must implement and comply with the terms of its agreement within thirty days.

Pursuant to 2 U.S.C. §437g(a)(4)(B)(i), no action by the Commission or any person, and no information derived, in connection with the conciliation of this matter will be made public without written consent of the respondents.

Sincerely,

Charles N. Steele
General Counsel

Encls.

Thomas J. Whitehead

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of American Telephone and Telegraph Company	)	MUR 947

CONCILIATION AGREEMENT

This matter was initiated on the basis of a signed, sworn and notarized complaint filed with the Commission by Glenn S. Watts, President of the Communications Workers of America. An investigation was conducted after reason to believe was found that American Telephone and Telegraph Company ("Respondent" or "AT&T") violated 2 U.S.C. §441b(b)(6) by failing to make available to Communications Workers of America a payroll deduction method for the making of voluntary contributions to its political action committee.

NOW, THEREFORE, the Commission and Respondent, having entered into the period of conciliation negotiations permitted by 11 C.F.R. §111.18(d), do hereby agree as follows:

1. The Commission has jurisdiction over the Respondent and over the subject matter of this proceeding.

2. Respondent has been afforded a reasonable opportunity to demonstrate that no action should be taken in this matter.

3. Respondent enters into this agreement with the Commission voluntarily and agrees that, pursuant to 11 C.F.R.

§111.18(d), this agreement has the same force and effect as a conciliation agreement reached pursuant to 2 U.S.C. §437g(a)(4) and, unless violated, is a complete bar to any further action by the Commission, including the bringing of a civil proceeding under 2 U.S.C. §437g(a)(6)(A).

4. The facts underlying this matter are as follows:

a. Respondent AT&T is a corporation, organized, existing, and doing business under the laws of the State of New York and having its principal place of business at 195 Broadway, New York, New York 10007.

b. The following corporations are either subsidiaries or affiliates of AT&T:

(1) Bell Telephone Laboratories, Incorporated ("Bell Laboratories"), a New York corporation having its principal place of business at 600 Mountain Avenue, Murray Hill, New Jersey 07974.

(2) New Jersey Bell Telephone Company ("New Jersey Bell"), a New Jersey corporation having its principal place of business at 540 Broad Street, Newark, New Jersey 07101.

c. By letter of April 17, 1978, to Charles L. Brown, President of AT&T, Glenn S. Watts, President of Communications Workers of America ("CWA") requested that AT&T make available to CWA in every location

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[in which CWA represents employees of AT&T], "its subsidiaries, branches, divisions, and affiliates, the methods of soliciting voluntary contributions or facilitating the making of voluntary contributions utilized by AT&T (the parent corporation) to its political action committees"; said letter specifically refers to 11 C.F.R. §114.5(k) as authority for its request.

d. AT&T replied that the Bell System did not have a single political action committee ("PAC") and that the responsibility for deciding whether to create a PAC and, if so, for managing the PAC rested upon each individual company. AT&T stated that 15 PACs had been established and that the payroll deduction method used by each would be made available to CWA in each of those 15 companies; AT&T advised that the local unions should deal with each company. AT&T did not agree to make a method available in those companies listed in paragraph 4b of this agreement.

e. On April 9, 1979, CWA filed a complaint with the Commission alleging that AT&T violated 2 U.S.C. §441b(b)(6) and 11 C.F.R. §114.5(5)(k).

f. On April 18, 1980, New Jersey Bell Telephone Company Political Action Committee ("NJBPAC")

filed a Statement of Organization and on May 12, 1980, amended its Statement of Organization whereby it lists New Jersey Bell Telephone Company as its connected organization and American Telephone and Telegraph Company Political Action Committee as "affiliated."

g. By letter of May 7, 1980, Bell Laboratories informed the Office of General Counsel of the Commission that, although Bell Laboratories does not have a "Political Action Committee" it intended to make available to CWA, upon written request, the payroll deduction method for voluntary contributions to a "PAC" organized and operated by the CWA.

h. On May 9, 1980, Rex Reed, Vice President of AT&T, wrote to Glenn S. Watts, President of CWA, that a payroll deduction method will be made available in all companies where CWA represents employees, including Bell Telephone Laboratories; Mr. Watts was advised to implement the method by having local unions contact each company.

5. AT&T recognizes that, upon written demand, it is required by 2 U.S.C. §441b(b)(6) to make available to CWA a system of payroll deduction for CWA's use in soliciting, or in facilitating the making of voluntary contributions to CWA's separate segregated fund. The above facts establish

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that after the Commission's finding of "reason to believe" and during a period of conciliation negotiations, AT&T agreed to make available to CWA a system of payroll deduction for CWA's use in facilitating the making of voluntary contributions to CWA's separate segregated fund by those employees of AT&T and all of its subsidiaries and affiliates who are members of and represented by CWA, subject to the reimbursement provisions of 2 U.S.C. §441b(b)(6).

6. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to the provisions of 2 U.S.C. §437g(a)(5)(D).

7. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

20 February 1981
Date

Charles N. Steele
General Counsel
Federal Election Commission

American Telephone and
Telegraph Company

January 12, 1981
Date

BY: Susan S. Lewis

ITS: Attorney

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	MURs 947 and 994
	)	
	)	
American Telephone and Telegraph Company	)	
	)	
Sandia Laboratories	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 19, 1981, the Commission decided by a vote of 4-0 to take the following actions regarding MURs 947 and 994:

1. Accept the conciliation agreement submitted by the American Telephone and Telegraph Company (Attachment 1b to the General Counsel's February 17, 1981 memorandum).

2. Accept the conciliation agreement submitted by Sandia Laboratories (Attachment 2b to the General Counsel's memorandum dated February 17, 1981).

3. Close the files in MUR 947 (AT&T) and MUR 994 (Sandia).

4. Authorize the General Counsel's Office to send the letter to counsel for the respondents (Attachment 3 to the General Counsel's February 17, 1981 memorandum).

Commissioners McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter. Commissioner Aikens abstained.

Attest:

2/19/81 Marjorie W. Emmons

Date Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 2-17-81, 11:31
Circulated on 48 hour vote basis: 2-17-81, 4:00

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OCC #1307

Susan Smith Lewis
Attorney—Public Affairs

AT&T
American Telephone and
Telegraph Company
2000 L Street N.W.
Rm 92-710
Washington, D. C. 20036
Phone (202) 457-2398

May 9, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Dear Mr. Steele:

Re: MUR 947

This is in response to your letter of April 14, 1980, to Mr. John W. Gray, Jr.

Enclosed are letters from The Southern New England Telephone Company, The Bell Telephone Laboratories, Inc., and a copy of a letter sent to you by New Jersey Bell Telephone Company. Also enclosed is a copy of AT&T's letter to Mr. Glenn Watts advising the union that payroll deduction methods will be made available to CWA at cost in Bell System companies that have CWA employees.

It is submitted that, with the filing of these letters, there is no longer any dispute and the issue of providing payroll deductions to CWA is moot with respect to the Bell System.

Respectfully,

Susan Lewis

dj

Enclosures

80 MAY 9 P3:58
GENERAL COUNSEL

Southern New England Telephone

Lewis H. Ulman
Vice President and General Counsel

227 Church Street
New Haven, Connecticut 06506
Phone (203) 771-2154

April 21, 1980

Charles N. Steele, Esq.
General Counsel
Federal Elections Commission
Washington, D.C. 20463

Re: MUR 947
In The Matter Of American Telephone And Telegraph Company

Dear Mr. Steele:

Your letter of April 14, 1980 to Alfred W. Van Sinderen, President of The Southern New England Telephone Company, has been referred to me for reply.

After review of your letter and the attached brief which contained your recommendation that probable cause be found to believe that The Southern New England Telephone Company has violated 2 U.S.C. § 441b(b)(6), please be advised that it is my opinion that consideration of the following two facts precludes such a finding.

First, you should be aware that The Southern New England Telephone Company does not have any employees represented by the Communications Workers of America (CWA). The Southern New England Telephone Company operates solely in the State of Connecticut and its non-management employees are represented only by the Connecticut Union of Telephone Workers (CUTW).

Second, by the time you receive this letter, the Federal Elections Commission will have already received an FEC Form 1 - Statement of Organization of The Southern New England Telephone Company Political Action Committee (SNETPAC). It is our intention to make available to the CUTW, upon receipt of written request, any method that the SNETPAC uses for voluntary contributions, including the payroll deduction method.

It is the position of The Southern New England Telephone Company that the above two factual considerations would preclude the Federal Elections Commission from making a determination of probable cause that it is in violation of 2 U.S.C. § 441b(b)(6).

If you require any additional information, please do not hesitate to let me know.

Very truly yours,

Lewis H. Ulman

Bell Laboratories

W. L. Keefauver
General Legal and Patent Counsel

600 Mountain Avenue
Murray Hill, N.J. 07974
Phone (201) 582-2233

May 7, 1980

Charles N. Steele, Esq.
General Counsel
Federal Elections Commission
Washington, D.C. 20463

Re: MUR 947
In the Matter of American Telephone and Telegraph Company

Dear Mr. Steele:

Your letter of April 14, 1980 to William O. Baker, Chairman of the Board, Bell Telephone Laboratories, Incorporated, has been referred to me for reply.

After review of your letter and the attached brief which contained your recommendation that probable cause be found to believe that Bell Telephone Laboratories, Incorporated, has violated 2 U.S.C. § 441b(b)(6), please be advised that Bell Laboratories does not have a Political Action Committee, but it is its intention to make available to the CWA, upon receipt of written request, the payroll deduction method for voluntary contributions to a PAC organized and operated by the CWA, with the necessary procedure including a basis for reimbursement of costs by CWA and the normal limitations on time and place of solicitation.

It is the position of Bell Laboratories that the above consideration would preclude the Federal Elections Commission from making a determination of probable cause that it is in violation of 2 U.S.C. § 441b(b)(6).

If you require any additional information, please do not hesitate to let me know.

Very truly yours,

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Bernard M. Hartnett, Jr.
Vice President and General Counsel

New Jersey Bell
540 Broad Street
Newark, New Jersey 07101
Phone (201) 649-2233

May 1, 1980

Mr. Charles N. Steele, General Counsel
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Steele:

Re: MUR 947

Your letter of April 14, 1980 to Mr. Morris Tanenbaum, President of New Jersey Bell Telephone Company, has been referred to me for reply.

I have reviewed your letter and the attached brief containing your recommendation to the Commission that it find probable cause to believe that New Jersey Bell has violated 2 U.S.C. §441b(b)(6). In my opinion, such a recommendation is unwarranted, not only for the reasons expressed in the material previously submitted for your consideration, but for the additional reason that the New Jersey Bell Telephone Company on April 18, 1980 filed with the Federal Election Commission, FEC Form 1 - Statement of Organization of the New Jersey Bell Telephone Company Federal Political Action Committee (NJBFEDPAC).

It is the intention of New Jersey Bell to make available to the Communications Workers of American (CWA), upon receipt of written request, any method that the NJBFEDPAC uses for voluntary contributions, including a payroll deduction method.

If you require any additional information, please let me know.

Very truly yours,

Bernard M. Hartnett

Bernard M. Hartnett, Jr.
Vice President and General Counsel

New Jersey Bell
540 Broad Street
Newark, New Jersey 07101
Phone (201) 649-2233

May 1, 1980

Mr. Charles N. Steele, General Counsel
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Steele:

Re: MUR 947

Your letter of April 14, 1980 to Mr. Morris Tanenbaum, President of New Jersey Bell Telephone Company, has been referred to me for reply.

I have reviewed your letter and the attached brief containing your recommendation to the Commission that it find probable cause to believe that New Jersey Bell has violated 2 U.S.C. §441b(b)(6). In my opinion, such a recommendation is unwarranted, not only for the reasons expressed in the material previously submitted for your consideration, but for the additional reason that the New Jersey Bell Telephone Company on April 18, 1980 filed with the Federal Election Commission, FEC Form 1 - Statement of Organization of the New Jersey Bell Telephone Company Federal Political Action Committee (NJBFEDPAC).

It is the intention of New Jersey Bell to make available to the Communications Workers of American (CWA), upon receipt of written request, any method that the NJBFEDPAC uses for voluntary contributions, including a payroll deduction method.

If you require any additional information, please let me know.

Very truly yours,

Bernard M. Hartnett

Rex R. Reed
Vice President

AT&T
American Telephone and
Telegraph Company
295 North Maple Avenue
Basking Ridge, N.J. 07920
Phone (201) 221-5400

May 9, 1980

Mr. Glenn E. Watts, President
Communications Workers of America
1925 K Street, N.W.
Washington, D. C. 20006

Dear Mr. Watts:

In my letter to you of June 12, 1978, I stated that Bell System companies with PACs would make available to CWA, at cost, the methods they used for soliciting voluntary contributions to the PACs.

PACs have now been established in all Bell System companies where CWA represents employees except Bell Telephone Laboratories. In accordance, with my letter, a payroll deduction method will be made available to CWA, at cost, to facilitate union PAC contributions in those companies with PACs. In addition, Bell Telephone Laboratories will make available to its CWA employees, at cost, a payroll deduction method for CWA PAC contributions.

As we suggested before, the best approach to implementation of the payroll deduction method is for your local people to deal directly with each company. A list of Bell System federal PACs is attached.

Sincerely,

Attachment

BELL SYSTEM FEDERAL PACS

American Telephone & Telegraph Company Federal Political Action Committee

American Telephone & Telegraph Company, Long Lines Employee Political Action Committee

Cincinnati Bell Federal Political Action Committee

Illinois Bell Citizenship Responsibility Committee

Indiana Bell Political Action Committee

Michigan Bell Political Action Committee

Mountain Bell Political Action Committee

New England Telephone Federal Political Action Committee

New Jersey Bell Telephone Company Federal Political Action Committee

New York Telephone Federal Political Action Committee

Northwestern Bell Federal Political Action Committee

Ohio Bell Federal Political Action Committee

Pacific Northwest Bell Employees' Public Interest Committee

Pacific Telephone Federal Political Action Committee

South Central Bell Federal Political Action Committee

Southern Bell Federal Political Action Committee

Southwestern Bell Employee Federal Political Action Committee

The Bell of Pennsylvania Political Action Committee

The Chesapeake and Potomac Telephone Company Federal Political Action Committee (C&P FED PAC)

The Diamond State Telephone Company Political Action Committee

The Southern New England Telephone Company Political Action Committee (SNET PAC)

Western Electric Political Action Committee

Wisconsin Telephone Company Federal Political Action Committee

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AT&T

IF NOT DELIVERED WITHIN 5 DAYS RETURN TO

American Telephone & Telegraph Company
2000 L Street, N. W., Suite 710
Washington, D.C. 20036

American Telephone and Telegraph Company
2000 L St., N.W., Suite 710, Washington, D.C. 20036

AT&T

Mr. Thomas Whitehead
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

G.S. 96 W (9/79)

First Class Mail

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 8, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Susan Lewis, Esquire
American Telephone and
Telegraph Company
2000 L Street, N.W.
Washington, D.C. 20036

Dear Ms. Lewis:

On May 7, 1980, the Commission voted to extend the time in which American Telephone and Telegraph Company may file a responsive brief pursuant to 2 U.S.C. §437g(a)(3) until May 9, 1980. This extension is granted pursuant to your motion filed on April 29, 1980, which purports to speak for Bell Laboratories, Inc., New Jersey Bell Telephone Company and The Southern New England Telephone and Telegraph Company.

If you have any questions, please contact Thomas J. Whitehead at 523-4000.

Sincerely,

Charles N. Steele
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Susan Lewis, Esquire
American Telephone and
Telegraph Company
2000 L Street, N.W.
Washington, D.C. 20036

Dear Ms. Lewis:

On May , 1980, the Commission voted to extend the time in which American Telephone and Telegraph Company may file a responsive brief pursuant to 2 U.S.C. §437g(a)(3) until May 9, 1980. This extension is granted pursuant to your motion filed on April 29, 1980, which purports to speak for Bell Laboratories, Inc., New Jersey Bell Telephone Company and The Southern New England Telephone and Telegraph Company.

If you have any questions, please contact Thomas J. Whitehead at 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Thomas J. Whitehead

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 947
American Telephone and Telegraph Company ("AT&T")	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Elections Commission, do hereby certify that on May 7, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 947:

1. Grant an extension to American Telephone and Telegraph Company in which to file a responsive brief until May 9, 1980.

2. Send the letter to Ms. Susan Lewis as attached to the Memorandum to Commission dated May 2, 1980.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

5/7/80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 5-2-80, 2:28
Circulated on 48 hour vote basis: 5-5-80, 11:00

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May 2, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 947

Please have the attached Memo distributed to the Commission on a 48 hour tally basis. Thank you.

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RECEIVED
COMMISSION SECRETARY
80 MAY 2 P2:28

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 2, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 947

On April 29, 1980, counsel for respondent American Telephone and Telegraph Company ("AT&T") filed a Motion for Extension of Time To Respond to the General Counsel's Brief until May 9, 1980. Implicit in said motion is the fact that AT&T will respond for and file a responsive brief on behalf of itself, Bell Laboratories, Inc., New Jersey Bell Telephone Company and The Southern New England Telephone Company.

AT&T was served with the General Counsel's Brief on April 15, 1980; Bell Laboratories and New Jersey Bell Telephone on April 16, 1980; and Southern New England on April 17, 1980. Thus, the time in which to file a responsive brief for AT&T expires on April 30, 1980, Bell Laboratories and New Jersey Bell on May 1, 1980 and Southern New England on May 2, 1980.

This office is of the opinion that, in the circumstances, an extension of time to respond is warranted.

Recommendation

1. It is recommended that the Commission grant an extension to American Telephone and Telegraph Company in which to file a responsive brief until May 9, 1980.

2. Send the attached letter to Ms. Susan Lewis.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Susan Lewis, Esquire
American Telephone and
Telegraph Company
2000 L Street, N.W.
Washington, D.C. 20036

Dear Ms. Lewis:

On May , 1980, the Commission voted to extend the time in which American Telephone and Telegraph Company may file a responsive brief pursuant to 2 U.S.C. §437g(a)(3) until May 9, 1980. This extension is granted pursuant to your motion filed on April 29, 1980, which purports to speak for Bell Laboratories, Inc., New Jersey Bell Telephone Company and The Southern New England Telephone and Telegraph Company.

If you have any questions, please contact Thomas J. Whitehead at 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION
April 29, 1980

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
80 APR 29 P 2:32

GCC#1187

In the Matter of	)	
	)	
American Telephone and Telegraph Company	)	MUR 947
	)	

MOTION FOR EXTENSION
OF TIME TO RESPOND
TO GENERAL COUNSEL'S BRIEF

American Telephone and Telegraph Company hereby requests an extension of time to respond to the General Counsel's brief and in support states the following:

1. On April 18, 1980, New Jersey Bell Telephone Company filed with the Federal Election Commission a Statement of Organization to establish a political action committee.

2. On April 21, 1980, The Southern New England Telephone Company filed a Statement of Organization for its political action committee.

3. The Southern New England Telephone Company has no employees represented by The Communications Workers of America (CWA).

4. As far as we can determine, only one Bell System unit remains affected by the General Counsel's proposed recommendation to the Commission. We hope to be in a position to comment on their behalf next week.

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Therefore, American Telephone and Telegraph Company seeks an extension of time until May 9, 1980, to respond to the General Counsel's brief.

Respectfully submitted,

April 29, 1980
Date

Susan Lewis
Attorney for
American Telephone and
Telegraph Company
2000 L Street, NW
Washington, DC 20036

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American Telephone and Telegraph Company
2000 L St., N.W., Suite 710, Washington, D.C. 20036

AT&T

Mr. Thomas J. Whitehead
General Counsel's office
Federal Election Commission
1325 K Street, NW, Room 720
Washington, DC 20463

G.S. 95 W (9/79)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Alfred W. Van Sinderen
President
The Southern New England Telephone Company
227 Church Street
New Haven, Connecticut 06506

Re: MUR 947

Dear Mr. Van Sinderen:

Based on a complaint filed with the Commission on April 9, 1979, the Commission determined on June 5, 1979, that there was reason to believe that American Telephone and Telegraph Company may have violated section 441b(b)(6) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

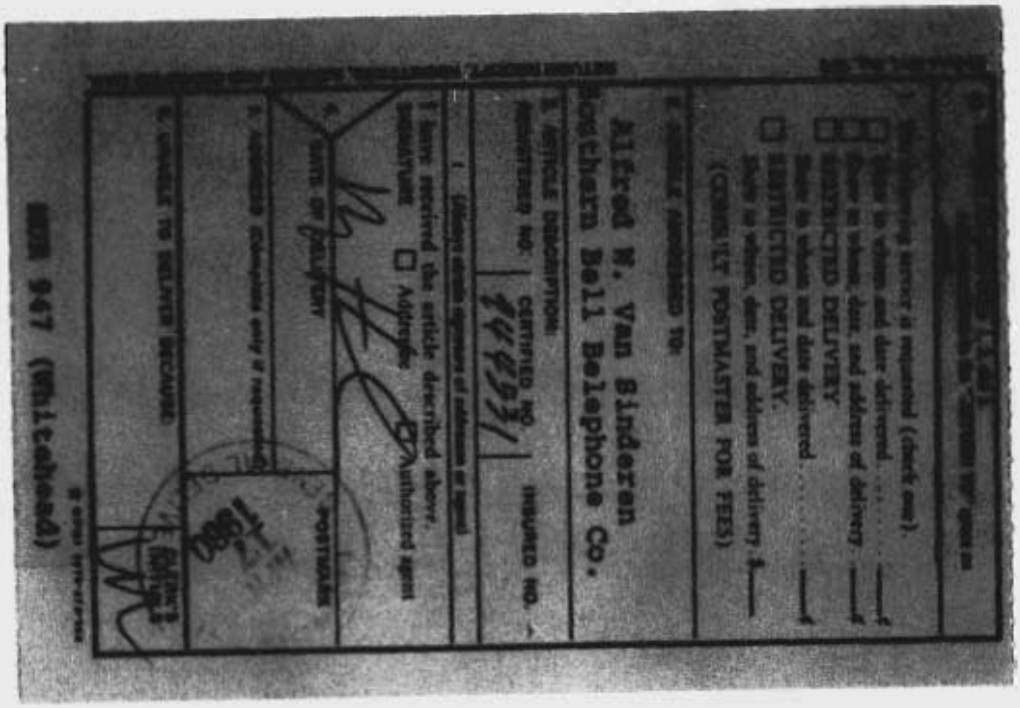
Mr. Alfred W. Van Sinderen
Page 2

Should you have any questions, please contact Thomas J. Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Morris Tanenbaum
President
New Jersey Bell Telephone Company
540 Broad Street
Newark, New Jersey 07101

Re: MUR 947

Dear Mr. Tanenbaum:

Based on a complaint filed with the Commission on April 9, 1979, the Commission determined on June 5, 1979, that there was reason to believe that American Telephone and Telegraph Company may have violated section 441b(b)(6) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter

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Mr. Morris Tanenbaum
Page 2

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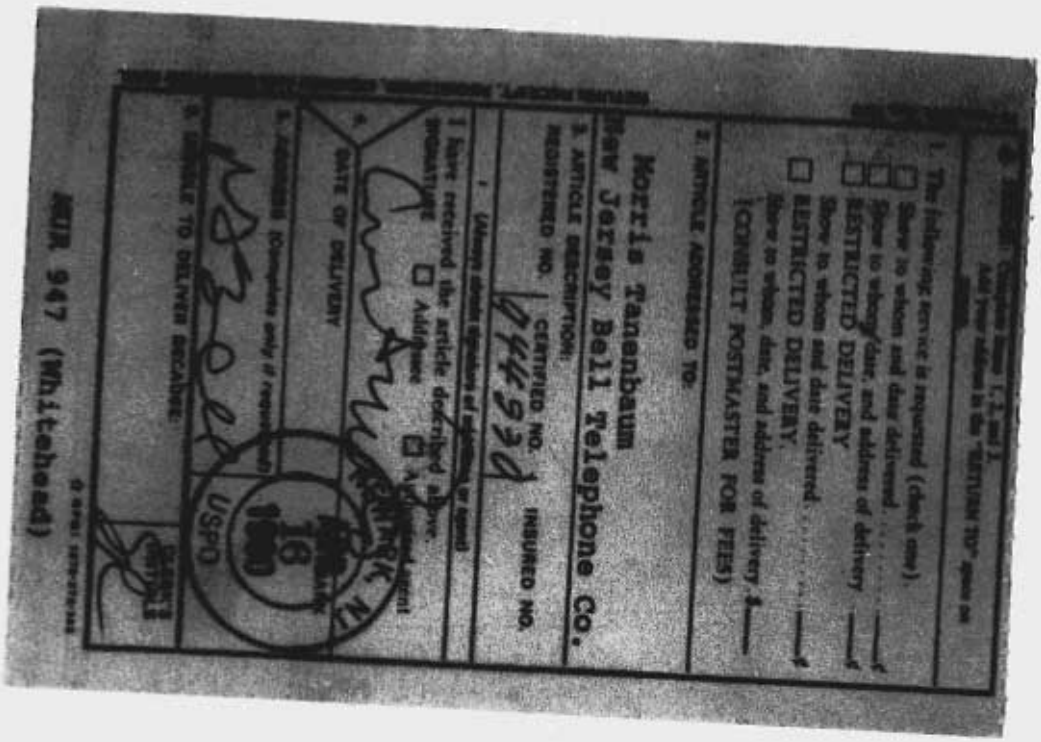
Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William D. Baker
President
Bell Telephone Laboratories, Inc.
600 Mountain Avenue
Murray Hill, New Jersey 07974

Re: MUR 947

Dear Mr. Baker:

Based on a complaint filed with the Commission on April 9, 1979, the Commission determined on June 5, 1979, that there was reason to believe that American Telephone and Telegraph Company may have violated section 441b(b)(6) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

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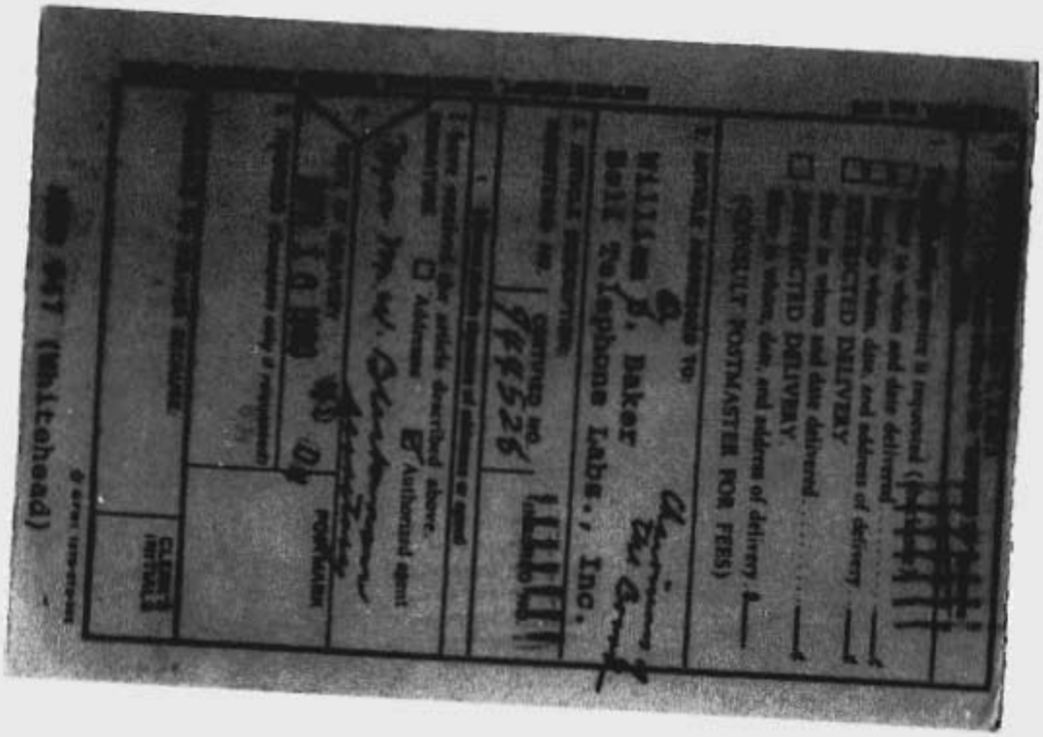
Should you have any questions please contact Thomas J. Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John W. Gray, Jr.
Assistant Vice President and Attorney
American Telephone and Telegraph Company
2000 L Street, N W.
Washington, D.C. 20036

Dear Mr. Gray:

Based on a complaint filed with the Commission on April 9, 1979, the Commission determined on June 5, 1979, that there was reason to believe that American Telephone and Telegraph Company may have violated section 441b(b)(6) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

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Mr. John W. Gray, Jr.
Page 2

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Sincerely,

Charles N. Steele
General Counsel

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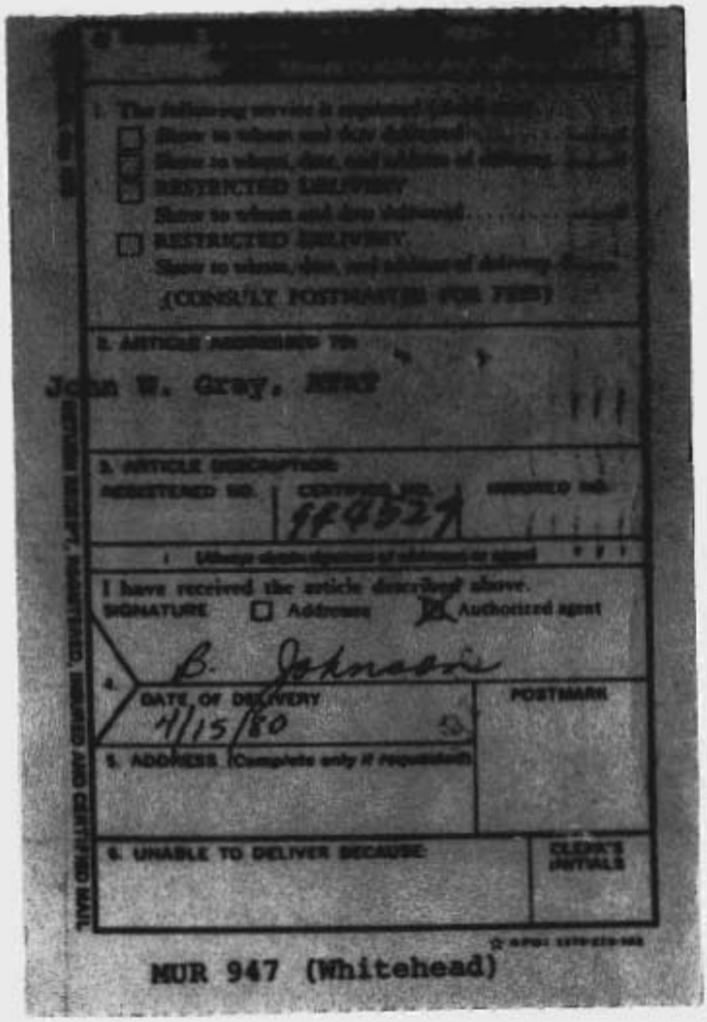

April 14, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 947 - Brief

Please have the attached Brief distributed to the Commission on an informational basis. Thank you.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 947

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of this brief and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on April 14 , 1980. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments
1. Brief
2. Letters to Respondents

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
80 APR 14 P 2: 26

BEFORE THE FEDERAL ELECTION COMMISSION
February 15, 1980

In the Matter of	)	
	)	MUR 947
American Telephone and Telegraph Company	)	
	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On June 5, 1979, the Commission found reason to believe that American Telephone and Telegraph Company (AT&T) had violated 2 U.S.C. § 441b(b)(6). The finding was based upon information contained in a complaint filed by the Communications Workers of America (CWA) against AT&T, its "subsidiaries, branches, divisions, and affiliates" charging a continuing violation of 2 U.S.C. § 441b(b)(6) and Section 114.5(k) of the Regulations.

An exchange of letters between CWA and AT&T, attached to the complaint, indicates that on April 17, 1978, CWA made a written request on AT&T pursuant to FECA and Part 114.5(k) of the Rules and Regulations to "make available" to CWA in "every location" of AT&T where CWA represents employees of AT&T "methods of soliciting contributions ... utilized by American Telephone and Telegraph Company (the parent corporation) to its political action committees." On June 12, 1978, AT&T advised CWA that 1) there is no one PAC for the Bell System, 2) fifteen individual companies do have PACs and 3) that methods of soliciting contributions vary from company to company. AT&T further informed CWA that the methods in those companies having PACs would be made

available to CWA, "at cost." CWA thus complained to the Commission that its request for solicitation methods at every location where CWA represents employees, i.e., on a company-wide basis, had been denied. Investigation has revealed that the method utilized in those companies within the Bell system having PACs is the payroll deduction method which varies from company to company depending on the computer hardware and software used. Although AT&T advised CWA to deal directly with each company having a PAC to implement the use of the payroll deduction method, we do not know of the current status of the implementation process in all of the corporations with PACs. However, we have no information or complaint indicating that CWA has been refused implementation therein.[1/]

An actual dispute does exist, however, with respect to the subsidiaries which do not have PACs, and therefore utilize no method of soliciting political contributions. AT&T has advised this office that that there are four such subsidiaries and that it is AT&T's position that CWA is not entitled to have payroll deduction made available to it in those four subsidiaries (see AT&T's response to reason to believe notification appended as Attachment 1 to this Brief).[2/]

1/ In fact, AT&T has advised that with respect to Chesapeake and Potomac Telephone Company (C&P), an agreement between CWA District 2 and C&P has been signed providing for CWA's use of C&P's payroll deduction method and is currently in effect. This was done since the filing of CWA's complaint. Also, CWA mentioned in an advisory opinion request (AO 1979-21) that its District 1 was negotiating with New York Telephone Company to establish payroll deduction for CWA. The only dispute there -- whether or not New York would have to bill CWA for the costs -- was resolved by the AO.

2/ Since AT&T's letter was written, one of the four subsidiaries -- Illinois Bell Telephone Co. -- has established a PAC.

II. LEGAL ANALYSIS

A. The Statute and Legislative History

The primary issue involved is the construction of 2 U.S.C. § 441b(b)(6) which reads as follows:

> Any corporation, including its subsidiaries, branches, divisions, and affiliates, that utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available such method, on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions, and affiliates.

This office concludes that the statute requires that a corporation which itself utilizes a method of soliciting political contributions must make that method available upon written request by a labor organization (at a cost sufficient to reimburse the corporation) to the requesting labor organization which represents members working either for the corporation or its subsidiary corporations or affiliated corporations or all of them even though some or all of the subsidiary or affiliated corporations[3/] do not have PACs.

3/ In interpreting the section, "branches" and "divisions" do not require separate analysis because they are, in the universally recognized language of corporate law, merely unincorporated parts of a corporation and have no separate legal existence. Therefore, the action of any one unincorporated branch or division is the action of the corporation, and any action required by the corporation would automatically extend to all of its unincorporated branches and divisions. See, e.g., Joseph E. Seagram & Sons, Inc. v. Hawaiian Oke & Liquors, Ltd., 416 F.2d 71 (9th Cir. 1969) cert. denied 396 U.S. 1062, 90 S. Ct. 752, 24 L. Ed. 2d 755 (1970); Poller v. CBS, 109 U.S. App. D.C. 170, 284 F.2d 599 (1960); New Amsterdam Cheese Corp. v. Kraftco Corp., 363 F. Supp. 135 (S.D.N.Y. 1973). Additionally, this case involves only corporations, AT&T being the parent corporation and all others within the Bell System being either subsidiaries or affiliates, depending on the extent of ownership and control by AT&T in each corporation. See Attachment 2, 1980 Directory of Corporate Affiliations, pp.64-65, indicating AT&T ownership interest in the listed companies.

In this matter, 2 U.S.C. § 441b(b)(6) requires that AT&T make available to CWA a deduction method for soliciting political contributions in each of the subsidiary and affiliated corporations in which CWA represents employees who are CWA members, notwithstanding the fact that certain of these subsidiaries do not have corporate PACs.

The statutory language of 2 U.S.C. § 441b(b)(6) compels this result: "Any corporation, including its subsidiaries ... and affiliates, that utilizes a method of soliciting voluntary contributions ... shall make available such method, on written request, ... to a labor organization representing any members working for such corporation, its subsidiaries ... and affiliates." AT&T utilizes a payroll deduction method of soliciting voluntary contributions and thus qualifies as "any corporation." CWA has made written request on AT&T for the use of "such method" (payroll deduction) throughout the Bell system (parent, subsidiaries and affiliates) where it represents workers and is thus statutorily entitled to have a payroll deduction method made available to it throughout the Bell System.

It is significant to note that in its response to the Commission's reason to believe notification, AT&T implicitly adopts this reasoning even though it rejects the result.

AT&T states:

> We submit that the intent of the statute is that when a corporation, whether an affiliate or a subsidiary of the parent corporation, maintains a uniform payroll system which provides for payroll deductions for political contributions to a PAC (and thereby could accommodate on a "company-wide" basis, payroll deductions for its employees represented by a labor organization) then and only then

> is that corporation required to extend to a labor organization, the use of its payroll withholding method in all of <u>its</u> affiliates, subsidiaries, departments, divisions, etc. for collecting voluntary political contributions. 4/ (Emphasis added).

Apparently AT&T would concede that a corporation must extend the use of a payroll withholding method to a labor organization for the collection of political contributions throughout its penumbra of affiliates, etc., only when it is convenient for the corporation, i.e. when a uniform method for collection is <u>in place</u>. This Office cannot concede that it is the existence of a uniform method of collection that controls the operation of the statute.

On the other hand, AT&T urges the Commission to adopt a "one-for-one" interpretation, i.e., only if a corporation has a PAC and a method of soliciting contributions must it accommodate the request of union(s) representing workers within that corporation when it argues, in effect, that the purpose of the statute is to "make available to the union PAC any payroll deduction system available to the corporation's PAC." 5/

A large roadblock to the "one-for-one" interpretation is the statutory phrases "including its subsidiaries, branches, divisions, and affiliates" at the beginning of the section and the phrase "working for such corporation, its subsidiaries, branches, divisions, and affiliates" at the end of the section. If the "one-for-one" argument were correct with respect to subsidiaries and affiliates,

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4/ Attachment 1, p.2.
5/ Attachment 1, pp.2-3.

these phrases would be at best superfluous since a subsidiary or an affiliate would itself qualify as "any corporation" and the union therein would be entitled to solicit its "members working for such corporation" using the method, if any, utilized by that subsidiary corporation or affiliated corporation. If those phrases were absent, a subsidiary utilizing no method would have no duty since the duty would only be imposed on "any corporation utilizing a method" and would only extend to "members working for such corporation."

The only possible explanation consistent with a "one-for-one" result would be that the clauses are merely illustrative of the types of corporations covered by the "one-for-one" rule. The first problem with this explanation is that the terms "branches" and "divisions" do not usually refer to <u>incorporated</u> entities.[6/] However, even if that problem is overcome, the illustrative explanation does not make sense when applied to the phrase at the end of the section. Although reasonable grammarians could probably disagree over the effect of using the conjunctive "and" in a clause introduced by the word "including" (the situation at the beginning of the section), the phrase "members working for such corporation, its subsidiaries,

---

6/ <u>See</u> footnote 3, <u>supra</u>. It is, of course, possible for a parent corporation to refer to one of its separately incorporated subsidiaries as a "division" or a "branch."

branches, divisions, and affiliates," both grammatically and logically means:

(1) Members working for such corporation; AND

(2) Members working for its [such corporation's] subsidiaries; AND

(3) Members working for its [such corporation's] branches; AND

(4) Members working for its [such corporation's] divisions; AND

(5) Members working for its [such corporation's] affiliates.

Dissecting the statute still further, it is obvious that the phrase "such corporation" refers back to the entity described by the phrase "that utilizes a method." The grammatical result would be that a labor organization representing members working for a subsidiary corporation of a parent corporation that utilizes a method would be entitled to use that method. Faced with this undeniable construction, the proponents of the "one-for-one" interpretation would leave only one remaining argument -- that although the words of the statute unambiguously give a union the technical right to have the method made available to it, they do not grant the right to use it in the subsidiary wherein its members are employed. Although § 441b (b)(6) does not in express terms provide where the union may use the method to which they are entitled, by including within its coverage a union, for example, whose entire membership works for a subsidiary of the corporation "that utilizes a method," the section necessarily implies that such a union can indeed

use the method in the subsidiary wherein its members are employed; this necessary implication is not diminished merely by the non-utilization of a method by such subsidiary itself.

Turning to the Commission's Regulations upon which CWA relies, Section 114.5(k), tracks the statute and reads as follows:

> Availability of methods. Any corporation, including its subsidiaries, branches, divisions, and affiliates, that uses a method of soliciting voluntary contributions from its stockholders or executive or administrative personnel and their families, shall make that method available to a labor organization representing any members working for the corporation, its subsidiaries, branches, divisions, and affiliates for soliciting voluntary contributions from its members and their families. Such method shall be made available on the written request of the labor organization and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby.

Section 114.5(k) breaks down into two severable parts, namely, the rule itself and four specific examples illustrating the application of the rule. As set forth above, the rule directly tracks the statute, adding only the language indicating the types of potential solicitees, i.e., "stockholders or executive or administrative personnel and their families" and "members [of the labor organization] and their families." Thus the legal effect of the Regulation is identical to the statute.

Only two of the four examples have bearing on this case.

CWA, in its April 9, 1979, complaint, specifically cites the example set forth in § 114.5(k)(1) as authority. That subsection reads as follows:

> If a corporation, including its subsidiaries, branches, divisions, or affiliates utilizes a payroll deduction plan, checkoff system, or other plan which deducts contributions from the dividend or payroll checks of stockholders or executive or administrative personnel,

> the corporation shall, upon written request of the labor organization, make that method available to members of the labor organization working for the corporation, its subsidiaries, branches, divisions, or affiliates, who wish to contribute to the separate segregated fund of the labor organization representing any members working for the corporation, or any of its subsidiaries, branches, divisions, or affiliates. The corporation shall make the payroll deduction plan available to the labor organization at a cost sufficient only to reimburse the corporation for the actual expenses incurred thereby.

By its terms, it indicates that a parent corporation utilizing a payroll deduction plan (or checkoff or other contribution deduction plan) shall make its "method" available throughout its corporate structure to a labor organization representing members working throughout its corporate structure who wish to contribute to the labor organization's separate segregated fund; the inexplicable use of the disjunctive "or" in place of the conjunctive "and" does nothing to alter this interpretation.

Example 4, § 114.5(k)(4), must also be considered in the context of this case; it reads as follows:

> If a corporation uses no method to solicit voluntary contributions or to facilitate the making of voluntary contributions from stockholders or executive or administrative personnel, it is not required by law to make any method available to the labor organization for its members. The corporation and the labor organizations may agree upon making any lawful method available even though such agreement is not required by the Act.

AT&T argues that this regulation should be read to apply to the situation at hand. It is our opinion that while this undoubtedly reflects the proper interpretation of the statute's applicability to a single unconnected corporation, it does not resolve the very complicated question with respect to those

corporations which are part of an interrelated corporate structure as is involved in the present case.

As mentioned above, the statute does not, in express terms, provide where the method must be made available; however, both the statute and the regulation answer the question by necessary implication. Unless the method must be made available in all the subsidiaries and affiliates of AT&T, there would have been no reason for the statute to make clear that the "labor organization" entitled to the benefit of the statute includes one with members working for subsidiaries. If the method were only to be required in the corporation utilizing the method and not in its subsidiaries not utilizing a method, there would have been no logic in Congress requiring the corporation to make the method available to a union which, for example, only represents employees of subsidiaries. Using such a union as an example, it would be entitled by the statutory language to have the method made available to it, but would have no use for the method unless it could use it in the subsidiaries where, in the example, its entire membership is employed. Since words used in a statute are presumed to have meaning and effect, the fact that Congress used language in describing "labor organization," which language includes a union with no members in the corporation itself but only in a subsidiary requires by necessary implication that the statute be construed to require that the method be made available in every subsidiary in which the union has members.

The present language of 2 U.S.C. § 441b(b)(6) is different from the respective versions passed by the House and Senate in H.R. 12406 [7/] and S. 3065. The language from the original House bill was as follows:

> [A]ny corporation which utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available, on written request, such method to a labor organization representing any members working for such corporation.

H.R. 12406, 94th Cong., 2d Sess., Title I, § 112(a)(1976), reprinted in FEC, Legislative History of Federal Election Campaign Act Amendments of 1976, at 986-988 (1977) [hereinafter "FECA 1976 History"] (intended to add new subsection (b)(2)(C)(iv) to Federal Election Campaign Act of 1971, Pub. L. No. 92-225, Title III, § 321). The language of the Senate bill, as passed, was as follows:

> Any corporation that utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available, on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, that method, to a labor organization representing any members working for that corporation.

S. 3065, 94th Cong., 2d Sess., Title I, § 110(4)(1976), reprinted in FECA 1976 History at 526-28 (intended to add

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7/ It should be noted that the House tabled H.R. 12406 and inserted the text of H.R. 12406 in place of the text of S. 3065. The House then passed its version of S. 3065 and the two versions of S. 3065 were submitted to conference.

new subsection (b)(5) to Federal Election Campaign Act of 1971, Pub. L. No. 92-225, Title III, § 321). As can be seen, the two versions were identical in all pertinent respects with the exception that the Senate version required the union to pay the costs of utilizing a method. Both of these original bills thus made it clear that each corporation regardless of its corporate status as a parent corporation, a subsidiary corporation, or a completely unconnected corporation, would be individually considered in determining whether it would be required to make a payroll deduction method available to a union PAC. If, as here, the corporation was using a payroll deduction method to solicit its stockholders, executive personnel, or administrative personnel, the union would be entitled to use payroll deduction to solicit its members in that corporation; if it was not using a payroll deduction method, then the corporation would have no obligation to the union in this regard.[8/]

When S. 3065 emerged from Conference Committee new language had been substituted for both the House and Senate language. See Committee of Conference, Conference Report to Accompany S. 3065, H.R. Rep. No. 94-1057, 94th Cong., 2d Sess. 20 (1976), reprinted in FECA 1976 History 1014 (adding new subsection (b)(6) to Federal

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8/ As explained in footnote 3, supra, the action of an unincorporated branch or division would still have been treated as the action of the "corporation," and the obligations of a "corporation" would still have extended to its unincorporated branches and divisions.

Election Campaign Act of 1971, Pub. L. No. 92-225, Title III, § 321). The Conference Report was approved by both houses and the new language was codified as the present 2 U.S.C. § 441b(b)(6). The Conference Report did not make any mention of the change and there was no mention of it on the floor of the House or the Senate.[9/] The only pertinent legislative history is the transcript of the Conference Committee Hearings.

Both houses of Congress had passed new solicitation provisions (referred to as the SUNPAC amendments) which were the subject of heated debate within the conference. During this debate, Rep. Hays announced, "I have a substitute SUNPAC amendment. I think it addresses all the problems." Hearings on S. 3065 Before the Committee of Conference, 94th Cong., 2d Sess. 122 (1976) [hereinafter "Conference Hearings"]. Subsequent amendments relating to solicitation were then offered to that "substitute," and not to the original House and Senate bills. The first pertinent solicitation related amendment was offered by Rep. Brademas,

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9/ In presenting the Conference Report to the full House, Chairman Hays stated, "Finally, the conferees agreed to a provision permitting corporations to solicit their stockholders and all their employees by mail twice a year.... A labor organization representing any employee of that corporation or its subsidiaries, branches, divisions, and affiliates is granted a correlative right...." Cong. Rec. H3777 (daily ed. May 3, 1976) (remarks of Rep. Hays), reprinted in FECA 1976 History 1077. While this statement does refer to the new language, it does so only with respect to the twice-yearly solicitation rule which does not permit the use of a payroll deduction method for either the corporation or the union.

which sought to amend the provision now codified as 2 U.S.C. § 441b(b)(5) so that it would have read:

> (5) Notwithstanding any other law, any method of soliciting voluntary contributions to a separate segregated fund established by a corporation, including any parent, subsidiary, branch, division, department or local unit of such corporation, permitted [by law] to corporations, including any parent, subsidiary, branch, division, department or local unit of such corporations, with regard to stockholders and executive or administrative personnel, shall also be permitted to labor organizations with regard to their members.

Id. at 131 (emphasis added to show Brademas language, brackets to show deleted language). Brademas explained his amendment in the colloquy below:

> The purpose of this amendment ... is simply to clarify the language so as to insure if a branch, division or local unit of a corporation uses a particular method to solicit contributions to a separate fund, then such method shall also be permitted to the labor organization concerned. It is impossible [possible ?] under the language which is under consideration for a branch, a division or local office of a corporation to use contributions from a political fund although the corporation itself doesn't use a checkoff. That fact could be interpreted under the present language to let the corporation deny to the union the right to use a checkoff for contributions even though a branch, or local branch of the division is using that method.

Id. at 131-32. The offering of this amendment and explanation led almost immediately to the following colloquy:

> Chairman Hays: I think if you would read the last page of paragraph 6, it is covered. Doesn't that cover what you are trying to do?
>
> Mr. Brademas: I think it does. Let me read it. That would do it.

Id. at 132. Before the discussion abruptly shifts to an unrelated topic, another significant colloquy took place:

> Chairman Cannon:
>
> . . . .
>
> Look at the language on line 21. I am not sure that relates back to the language you wanted it to relate to. If you took Wayne's language and said ["] any corporation including its branches ["] up on line 15, then take the rest of it out.
>
> Chairman Hays: That is all right with me.

Id. at 132 (emphasis added). No vote was taken. Although we do not know what "line 15" and "line 21" referred to, the adopted language was thus directed to resolving the concern expressed by Brademas in a manner favorable to his position.

The only relevant debate on the present 2 U.S.C. § 441b(b)(6) occurred when Sen. Scott of Pennsylvania offered the following alternative language to Item 6 of the "package:"

> Any corporation or subsidiary, branch, division, or local unit of such corporation that utilizes a method of soliciting voluntary contributions or facilitating making of voluntary contributions shall make available that method on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization with regard to any members it represents working for that corporation, or that subsidiary, branch, division, department or local unit of such corporation.

Id. at 261. The debate on this attempt to change the substitute focused on the problem at issue, with Senator Scott and supporters of his suggestion arguing that the use of solicitation methods by the union should be limited to only those units which themselves were using a political deduction method.

3 1 0 1 0 2 3 5 4 5 5

Chairman Cannon. It just sounds like it is a restatement in different language.

Mr. Brademas. I will tell you what the purpose of it is, Senator. The major distinction between the language in the package and this amendment -- as I see it, and so far as I can understand it, the only justification for it is to restrict the universe of union members who would be solicited by including the words following the words "to a labor organization" -- "with regard to any members it represents." Isn't that the point of it?

Mr. Wiggins. If we look at Item 6, that is the section to be amended -- it says that any corporation or any of its far-flung subsidiaries, branches, divisions, or affiliates, that uses a payroll deduction, a check-off, any one of those divisions which uses a check-off, thereupon makes available to a labor organization representing any member of that corporation the same right, even though the check-off may exist with respect to only one division, only one subsidiary. That is 6. And I think it does need amendment.

Your amendmen [sic] says that the check-off will apply only to that unit, and not to all of the far-flung units which may not maintain the check-off.

Mr. Scott. That is because the corporation may have a union shop in one of the divisions and a non-union shop in the other.

Mr. Wiggins. Your amendment says that any division, subsidiary, [t]hat utilizes a check-off shall make available to the union members in that division the same right.

Mr. Scott. That is right.

Mr. Wiggins. But that it doesn't open up the entire corporate entity, even though it doesn't use a check-off in the other divisions.

Mr. Scott. If they don't use it, there is no extension of a non-use to anyone else. That is the intent.

Mr. Wiggins. That is right. I think it is a constructive, fair amendment.

Mr. Dent. That is splitting hairs, if you ask me. What is the difference? Are you willing to invite strikes over the fact that the corporation is denying the right to have a check-off when they have a check-off over in this unit of the same corporation? What are you talking about?

Mr. Scott. If it is the same unit, each side gets the check-off. If the corporation uses it, the union has the right to use it. That is all.

Mr. Dent. What we have said -- we said that if the -- it is considered to be one PAC, with the subsidiaries. How are you going to separate from that PAC a certain subsidiary? Let's not get into trying to outdo each other in building some particular favor for one group, and destroying the whole intent of the act.

Mr. Scott. That does not destroy the intent of the Act.

Mr. Dent. If the PAC has a check-off, the Union has the right to use check-off. If the PAC itself decides not to check off some particular subsidiary, that does not divorce the subsidiary from the original PAC.

Mr. Wiggins. Let me say in partial response -- just speaking to the question of equity -- this poses no restrictions at all on labor unions. It does not give any reciprocal right to corporations to utilize the same methods employed by labor unions.

This [Item 6] is a one-way section aimed only at corporations. And it says, unless it is amended, that any time a division of a corporation that may have hundreds of units utilizes a check-off in any one of those divisions, it must open up the whole corporate structure for the check-off provision, even though it is not utilized in any other division.

Mr. Dent. You realize the union is helpless in setting up its own check-off without permission from the corporate entity. You are giving the corporate entity a veto in a pick and choose subsidiary, to deny check-off and to give them check-off where they feel it will do the least good.

Let's be honest about it.

> Mr. Wiggins. It is an exactly comparable right. The whole idea here, and we discussed very early in these discussions -- if the management people use a check-off, it was fair that the Union people use a check-off. And I still subscribe to that. But this goes beyond that.
>
> Mr. Dent. Can I give you the answer to that?
>
> I will give you the answer very plainly. In a corporate entity, it can have many subsidiaries -- and I can name you some that have union subsidiaries, and non-union subsidiaries. They will use the check-off in the non-union subsidiaries, and deny it in the subsidiaries that are unionized. Don't tell me. This is a game we are playing. They are a subsidiary -- I say if they are covered by one PAC, whatever they do for the PAC itself, must go through the whole PAC.
>
> Mr. Scott. If they are covered by one PAC, that is one question. They may not be.

Id. at 261-65 (emphasis added). Following this discussion, the Senate conferees defeated the Scott amendment by a show of hands and it did not therefore reach a vote of the entire conference. Id at 265. The legislative history thus reinforces the interpretation of the statute set forth above.

For purposes of clarity, the following chart illustrates the differences between the section as it now exists, the original House and Senate bills (identical in all relevant parts), and the defeated Scott amendment; assuming in each case that the Union represents members working for the individual corporate entities:

3 1 0 1 0 2 3 5 1 5 9

Under the language of the	If method exists in	Method must be made available in
Statute	a branch or division	entire corporation of which it is a part
	parent	the parent and each subsidiary and affiliate of the parent
	a subsidiary or affiliated corporation	(1) such affiliate or subsidiary (2) all affiliates and subsidiaries of such affiliate or subsidiary (3) the parent of such affiliate or subsidiary and all affiliates and subsidiaries of such parent 11/
House/Senate bill	a branch or division	entire corporation of which it is a part
	a parent, subsidiary or affiliated corporation	only such parent, subsidiary or affiliated corporation
Scott amendment	a branch or division	only such branch or division
	a parent subsidiary or affiliated corporation	only such parent, subsidiary or affiliated corporation

The application and enforcement of the 2 U.S.C. § 441b(b)(6) and Section 114.5(k) will be discussed separately with respect to (1) the AT&T subsidiary corporations which currently utilize a method and (2) the AT&T subsidiary corporations which do not utilize a method.

B. The Corporations Which Utilize A Method.

There is no dispute that AT&T and any subsidiary corporations which utilize a payroll deduction system must make that system

available to CWA in each such corporation for its use in collecting voluntary contributions to its PAC. AT&T concedes this point. 10/

AT&T has suggested the most efficient way for CWA to have each such method implemented. AT&T has explained by letter both to CWA and to this office that the various corporations do not use a centralized payroll system and therefore each has a slightly different procedure for making payroll deductions for PAC contributions. For this reason, AT&T suggested that CWA discuss the details (e.g., costs) of implementing the system with each company. Since then, CWA has worked out an agreement with at least C&P Telephone Company. Although we do not know the current status with respect to the other companies with PACs, 11/ we have no information that any problems have arisen therein, and have received no such complaint.

C. The Corporations Which Do Not Utilize A Method

It appears that the disputed part of CWA's request concerns whether a method must be made available for the union PAC in those

---

10/ Thus, AT&T has complied with the statute in regard to the corporations with PAC's. But since AT&T, as the parent corporation, conceded that CWA's written request to it is legally sufficient to have made available to CWA the payroll deduction methods now extant in fifteen of its affiliates and subsidiaries, this has shifted the buden of proceeding to CWA to implement in each such subsidiary and affiliate. The Commission should not presently take further action. Refusal on the part of any of the fifteen once reported to the Commission would provide sufficient basis for a probable cause to believe finding that the subsidiary or affiliate violated 2 U.S.C. § 441b (b)(6).

11/ But see footnote 1, supra (negotiations underway with New York Telephone Company as of May 3, 1979).

three corporations (or any others the existence of which we are not aware) which do not maintain corporate PACs and which do not utilize <u>any</u> method whatsoever.

After extensive discussion, research, and analysis of both the statute and regulations, this office concludes that CWA is entitled to have a payroll deduction system made available to it for the collection of voluntary contributions from its members to its PAC in every subsidiary of AT&T in which CWA represents any such members. In order to reach this conclusion, it is not necessary to consider the "including" language, above. Whatever that language may add to the coverage of the statute, it is clear that AT&T is "[a]ny corporation" and that AT&T "utilizes a method" (i.e. payroll deduction). These two facts alone are sufficient in this case to conclude under the statute that AT&T must make payroll deduction ("such method") available to CWA which is "a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions, and affiliates." Nor can it be maintained that Section 114.5(k) alters this conclusion.

Thus, by refusing to make the payroll deduction method available in those subsidiaries which do not utilize this method but in which CWA represents members, AT&T has violated 2 U.S.C. § 441b(b)(6).

We recommend that the Commission find probable cause to believe that AT&T violated 2 U.S.C. § 441b(b)(6) and proceed to conciliation with AT&T; we also recommend that the three

subsidiary corporations not having PAC's and thus not having payroll deduction methods for soliciting contributions be joined as necessary parties pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) for complete relief; at this point, it appears that Bell Telephone Laboratories, Inc., New Jersey Bell Telephone Company and Southern New England Telephone Company fall into this category. The Commission, however, must be aware of the difficulties involved in this course of action.

It is expected that each of the three subsidiaries will contend that there is no reason to believe that each has violated 2 U.S.C. § 441b(b)(6) in that:

(1) it utilizes no method soliciting voluntary contributions, and thus cannot make available "such method;" and

(2) even though it employs members of CWA it has received no written request from CWA, the request being made to AT&T.

The first contention has been met, we believe, by the above analysis. The result of our analysis is that the method to be made available is that utilized by AT&T, the parent corporation, i.e., the payroll deduction method. The second contention poses a difficult but not insurmountable problem. It is our conclusion that the written request by CWA to AT&T is imputable to the three subsidiary corporations. Indeed, AT&T acknowledged the request as constituting a request on those subsidiary corporations having PAC's and authorized the payroll deduction methods to be made available to CWA leaving only the implementation up to the local unions of CWA and the individual subsidiary

corporations; AT&T cannot now argue that its action in denying CWA's request does not stand on equal footing, i.e., the request to AT&T was a request to all AT&T subsidiaries and affiliates.[12/]

III. GERNERAL COUNSEL'S RECOMMENDATION

1. Find probable cause to believe that AT&T and its subsidiaries and/or affiliates, Bell Telephone Laboratories, Inc., New Jersey Bell Telephone Company and Southern New England Telephone Company have violated 2 U.S.C. § 441b(b)(6).

14 April 1980
Date

Charles N. Steele
General Counsel

Attachments
1. AT&T's response to reason to believe notification
2. 1980 Directory of Corporate Affiliations, pp.64-65

12/ It should be noted that AT&T could argue that it cannot as a shareholder direct the subsidiary corporations to make the methods available to CWA, notwithstanding that it has authorized those fifteen corporations having PACs to do so. By proceeding against the three subsidiariary corporations under 2 U.S.C. § 437g(a)(2) this problem will be overcome. At that point, the Commission can direct the respondents jointly and severally to produce the result of making the payroll deduction method available to CWA.

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

John W. Gray, Jr.
Assistant Vice President and Attorney

79 JUN 1 P3:23

AT&T
American Telephone and
Telegraph Company
2000 L Street, Northwest
Washington, D. C. 20036
Phone (202) 457-3843

July 2, 1979

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
79 JUL 2 P3:25

William C. Oldaker, Esquire
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Re: MUR 947

Dear Mr. Oldaker:

This is in response to your letter dated June 7, 1979, notifying American Telephone and Telegraph Company (AT&T) of a complaint filed by Glenn E. Watts, President of the Communications Workers of America (CWA), alleging a violation by AT&T of the Federal Election Campaign Act of 1971, as amended.

The Bell System is composed of American Telephone and Telegraph Company and its subsidiaries and affiliated companies, including the various operating telephone companies. AT&T's ownership of its subsidiary and affiliated corporations ranges from 100% to less than 20%. These are substantial companies of which 11 have between 25,000 and 90,000 employees each and two have more than 100,000 employees each.

On June 12, 1978, Mr. Rex Reed, Vice President of AT&T, wrote Mr. Watts pointing out that there is no single political action committee for AT&T and its subsidiaries and affiliated companies, but rather the decision whether to create such a committee rests with each individual company (a copy of Mr. Reed's letter was attached to your letter of June 7, 1979). There are presently 20 federal Political Action Committees (PACs) which have been created by Bell System affiliated companies. Those companies which have organized PACs are listed in Attachment I and those which do not have PACs are listed in Attachment II.

Mr. Reed's letter explained that those companies having PACs, all of which utilize some method of payroll deduction for collecting the political contributions of their employees, will make available to the CWA, at cost, their payroll deduction method to facilitate the making of voluntary political contributions.

There are differences among the various Bell System companies as to the type of payroll deduction methods utilized for PACs, depending upon the payroll system used by a particular company. As Attachment III indicates, the equipment, method of data entry, and the sophistication of each payroll system varies. Each company has tailored its payroll deduction system to its own system's requirements and to the needs of the company's PAC. Additionally, each company's federal PAC is separately organized, has been separately registered with the Federal Election Commission, has separate officers, is separately administered and prepares and files its own reports. Because, among other reasons, there is no uniform payroll deduction system, it is our position that the CWA should deal directly with each Bell System company having a PAC, as CWA has recently done with the Chesapeake & Potomac Telephone Companies. The agreement reached by CWA and the Chesapeake & Potomac Telephone Companies (see Attachment IV) demonstrates the logic of implementing payroll deduction systems on a company by company basis.

As to the alleged violation of 2 U.S.C. § 441b (b)(6), it is our position that this section does not require those Bell System Companies, even though a subsidiary or affiliate of AT&T, that do not have PACs (and whose payroll systems do not, therefore, provide for payroll deductions for political contributions) to modify their payroll systems in such a manner as to establish for the CWA a method of payroll deduction for political contributions by its membership. We submit that the intent of the statute is that when a corporation, whether an affiliate or subsidiary of the parent corporation, maintains a uniform payroll system which provides for payroll deductions for political contributions to a PAC (and thereby could accommodate, on a "company-wide" basis, payroll deductions for its employees represented by a labor organization) then and only then is that corporation required to extend to a labor organization the use of its payroll withholding method in all of its affiliates, subsidiaries, departments, divisions, etc., for collecting voluntary political contributions.

To fulfill CWA's request in the four companies that do not have PACs is not a simple matter of adding a few names to an existing PAC payroll deduction system. Since each of the four companies has a different payroll system (see Attachment III), each company's payroll system would have to be modified to accommodate and develop a new payroll deduction system. Our interpretation, that the statute does not contemplate such action, is consistent with the purpose of the statute--to make available to the union PAC any payroll deduction

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system available to the corporation's PAC. (See House Conference Report No. 94-1057, 94th Congress 2d Sess. at p. 62.)*

In view of the foregoing, it is submitted that the complaint lodged by the CWA is without merit and should be dismissed. If we can furnish you any further information, please let me know.

Respectfully yours,

John W. Gray, Jr.

John W. Gray, Jr.
Assistant Vice President
and Attorney

Attachments

*This interpretation is also consistent with your letter of June 7 where you speak of the alleged failure of AT&T "to make available to CWA, on a company-wide basis, the payroll deduction method for the making of voluntary contributions that is utilized in several AT&T subsidiaries." (emphasis added)

ATTACHMENT I

Major Bell System Units with PACs

Company Name	Company PAC
American Telephone & Telegraph Co. General Departments	American Telephone Political Action Committee
American Telephone & Telegraph Co. Long Lines	American Telephone & Telegraph Company, Long Lines Employee Political Action Committee
Bell Telephone Company of Pennsylvania	Bell of Pennsylvania Political Action Committee
Chesapeake & Potomac Telephone Co.	C&P Federal Political Action Committee
Cincinnati Bell, Inc.	Cincinnati Bell Federal Political Action Committee
The Diamond State Telephone Co.	Diamond State Telephone Political Action Committee
Indiana Bell Telephone Co., Inc.	Indiana Bell Political Action Committee
Michigan Bell Telephone Company	Michigan Bell Political Action Committee
Mountain Bell Telephone Company	Mountain Bell Employee Active Citizenship Program
New England Telephone & Telegraph Co.	New England Telephone Federal Political Action Committee
New York Telephone Company	New York Telephone Federal Political Action Committee
Northwestern Bell Telephone Co.	Northwestern Bell Federal Political Action Committee
Ohio Bell Telephone Company	Ohio Bell Federal Political Action Committee
Pacific Northwest Bell Telephone Co.	Pacific Northwest Bell Employee Public Interest Committee
Pacific Telephone Company	Pacific Telephone Federal Political Action Committee
South Central Bell Telephone Co.	South Central Bell Federal Political Action Committee

Attachment I - Cont'd

Company Name	Company PAC
Southern Bell Telephone & Telegraph Company	Southern Bell Federal Political Action Committee
Southwestern Bell Telephone Company	Southwestern Bell Employee Federal Political Action Committee
Western Electric Company, Inc.	Western Electric Political Action Committee
Wisconsin Telephone Company	Wisconsin Telephone Company Federal Political Action Committee

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Attachment I - Cont'd

Company Name	Company PAC
Southern Bell Telephone & Telegraph Company	Southern Bell Federal Political Action Committee
Southwestern Bell Telephone Company	Southwestern Bell Employee Federal Political Action Committee
Western Electric Company, Inc.	Western Electric Political Action Committee
Wisconsin Telephone Company	Wisconsin Telephone Company Federal Political Action Committee

3 1 0 1 0 2 7 3 1 9 0

ATTACHMENT II

Major Bell System Units without PACs

Bell Telephone Laboratories, Inc.

Illinois Bell Telephone Company

New Jersey Bell Telephone Company

Southern New England Telephone Company

3 1 7 1 7 2 3 5 1 9 1

Attachment IV

C&P Telephone

L. E. Dyer
Vice President

1710 H Street, N. W.
Washington, D. C. 20006
Phone (202) 392-3307

June 26, 1979

Mr. George R. Strick
Vice President
District 2
Communications Workers of America
1015 20th Street, N.W.
Washington, D.C. 20036

Dear Mr. Strick:

This is to confirm our understanding of June 26, 1979 with regard to the conditions under which the C&P Telephone Companies agree to make available to the Communications Workers of America methods of soliciting voluntary contributions and/or facilitating the making of voluntary contributions to the CWA-COPE Political Contributions Committee, Secretary-Treasurer, C.W.A. (CWA-COPE-PCC), under the Federal Election Campaign Act Amendments of 1976.

1. The parties agree to the conditions of the allotment program as set forth in Attachment 1, "Summary of the CWA-COPE-PCC Allotment Program" and Exhibit 1 thereto.

2. The parties further agree that the Company assumes no responsibility in connection with the allotment except that of collecting and forwarding monies to the CWA-COPE-PCC, Secretary Treasurer, C.W.A. The Union indemnifies the Company and holds it harmless from all claims, damages, costs, fees or charges of any kind which may arise out of the honoring by the Company of deduction authorizations in accordance with the terms of this agreement, the making up of sums owed the Union in cases of inadvertent failure to timely honor authorizations and transmitting such deductions to the Secretary Treasurer, C.W.A.

3. Union solicitation of personal contributions to CWA-COPE-PCC on Company premises shall be limited to non-working hours and non-working spaces in accordance with Article 8 of the General Agreement.

4. The Union designates September 1979 as the initial enrollment period.

5. The Union agrees to pay the Company for actual clerical handling charges in connection with the establishment of the allotment program incurred during the initial enrollment period at the rate of $8.76 per clerical hour but not to exceed in total $2,150.00. In each and every month following the initial enrollment period during which the program continues, the Union agrees to pay to the Company the sum of fifty dollars ($50.00) for computer processing costs plus a fee of two cents ($0.02) per employee making an allotment during that month.

6. This agreement may be cancelled by the Union upon thirty days notice to the Company and shall be cancelled upon thirty days notice to the Union by the Company that the Company has discontinued its C&P Political Action Committee for management employees.

7. Please signify your agreement to the foregoing by signing your name in the space provided below and returning two signed copies to the Company. Two additional signed copies are enclosed for your records.

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY
OF MARYLAND

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY
OF VIRGINIA

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY
OF WEST VIRGINIA

By [signature]
Vice President - Personnel

THE COMMUNICATIONS WORKERS
OF AMERICA

By [signature]
Vice President - District 2

ATTACHMENT 1

SUMMARY OF THE CWA-COPE-PCC ALLOTMENT PROGRAM

1. Authorization Form - The Company will accept deduction authorizations from eligible employees in the bargaining unit in the form of Exhibit 1 attached. The Company will provide the Union with a detailed layout of the authorization form suitable for reproduction. The Union will supply deduction forms to employees at its own expense.

2. Frequency of Allotment - Allotments will be deducted weekly in the first four pay periods in the month. The minimum deduction shall be ten cents ($0.10) per week.

3. Date of Remittance - The Company shall remit allotments to the CWA-COPE Political Contributions Committee, Secretary-Treasurer, C.W.A. (whose address is 1015 20th St., N.W. Washington, D.C. 20036) by the 12th calendar day of the following month.

4. Effective Dates for Beginning and Change of Allotment - Deductions will begin or change in the first pay period ending in the month following receipt of the authorization. Authorizations are to be forwarded to the payroll office at least ten (10) working days prior to the first payroll period ending in the month in which the authorization is to be effective.

5. Effective Date of Cancellation - Cancellations shall be effective immediately upon receipt.

6. Action When the Employee Leaves the Company - Authorization is automatically cancelled when the employee leaves the employment of the C&P Company which has been authorized to make the deduction.

7. Action When Leave of Absence is Granted - The allotment will be automatically suspended when the employee goes on leave.

8. Action When the Employee Returns from Leave of Absence - The allotment will automatically be resumed with the first pay period ending in the month following the employee's return from leave.

9. Action When the Employee Retires - The allotment is automatically cancelled.

10. Action When the Employee is Transferred Out of the Bargaining Unit - The allotment is automatically cancelled.

11. Action in the Case of Insufficient Wages or Omitted Deduction - For any pay period in which the employee's pay (including sickness or accident disability payments) is not sufficient to permit the deduction for CWA-COPE-PCC (which shall be placed last in priority for all other authorized deductions) no makeup will be made in any subsequent pay period.

12. Paydraft Indication - The employee's paydraft will carry an indication of the CWA-COPE-PCC deduction.

ALLOTMENT AUTHORIZATION FORM

A two-part form with perforation for separating the "Union Copy" from the "Payroll Copy".

PLEASE PRINT YOUR

LAST NAME FIRST NAME INITIAL

I HEREBY AUTHORIZE THE C&P TELEPHONE COMPANY OF _____ TO DEDUCT FROM MY WAGES, IN ACCORDANCE WITH THE AGREEMENT BETWEEN THE COMPANY AND C.W.A. DATED JUNE ___, 1979, ALLOTMENTS WHICH ARE TO BE REMITTED TO THE CWA-COPE POLITICAL CONTRIBUTIONS COMMITTEE, SECRETARY-TREASURER, C.W.A. THIS AUTHORIZATION IS VOLUNTARILY MADE ON THE SPECIFIC UNDERSTANDING THAT THE SIGNING OF THIS AUTHORIZATION AND THE MAKING OF PAYMENTS TO CWA-COPE-PCC ARE NOT CONDITIONS OF MEMBERSHIP IN THE UNION OR OF EMPLOYMENT WITH THE COMPANY AND THAT CWA-COPE-PCC WILL USE THE MONEY IT RECEIVES TO MAKE POLITICAL CONTRIBUTIONS AND EXPENDITURES IN CONNECTION WITH FEDERAL, STATE AND LOCAL ELECTIONS. THIS AUTHORIZATION REVOKES AND SUPERSEDES ANY AUTHORIZATION PREVIOUSLY GIVEN BY ME.

COPY FOR PAYROLL OFFICE.

CWA LOCAL NO | | | | | | | Form

1. ENTER SOCIAL SECURITY NUMBER HERE →

2. ENTER AMOUNT TO BE DEDUCTED MONTHLY TO CANCEL ENTER 000.00

Monthly Amount		CENTS	PAC
688			CWA

/ /

Date Signature (in ink)

REQUEST FOR PAYROLL ALLOTMENTS FOR POLITICAL ACTION COMMITTEE-CWA

LEASE PRINT OUR

LAST NAME FIRST NAME INITIAL

I HEREBY AUTHORIZE THE C&P TELEPHONE COMPANY OF _____ TO DEDUCT FROM MY WAGES, IN ACCORDANCE WITH THE AGREEMENT BETWEEN THE COMPANY AND C.W.A. DATED JUNE ___, 1979, ALLOTMENTS WHICH ARE TO BE REMITTED TO THE CWA-COPE POLITICAL CONTRIBUTIONS COMMITTEE, SECRETARY-TREASURER, C.W.A. THIS AUTHORIZATION IS VOLUNTARILY MADE ON THE SPECIFIC UNDERSTANDING THAT THE SIGNING OF THIS AUTHORIZATION AND THE MAKING OF PAYMENTS TO CWA-COPE-PCC ARE NOT CONDITIONS OF MEMBERSHIP IN THE UNION OR OF EMPLOYMENT WITH THE COMPANY AND THAT CWA-COPE-PCC WILL USE THE MONEY IT RECEIVES TO MAKE POLITICAL CONTRIBUTIONS AND EXPENDITURES IN CONNECTION WITH FEDERAL, STATE AND LOCAL ELECTIONS. THIS AUTHORIZATION REVOKES AND SUPERSEDES ANY AUTHORIZATION PREVIOUSLY GIVEN BY ME.

COPY FOR UNION

CWA LOCAL NO | | | | | | | Form

1. ENTER SOCIAL SECURITY NUMBER HERE →

2. ENTER AMOUNT TO BE DEDUCTED MONTHLY TO CANCEL ENTER 000.00

Monthly Amount		CENTS	PAC
688			CWA

HOME ADDRESS	STREET		APT. NO.
	CITY	STATE	ZIP CODE

/ /

Date Signature (in ink)

REQUEST FOR PAYROLL ALLOTMENTS FOR POLITICAL ACTION COMMITTEE-CWA

AMERICAN STANDARD, INC.—(continued)

Clayton Dewandre Holdings Ltd.
11 Bruton St.
London, England W1X 8EH
Tel.: 01-493-1211

WABCO Fahrzeugbremsen G.m.b.H.
Postfach P 12 80
Hannover St. 30000,
00 (0)5 44.471
Tel.: W. Germany

WABCO-Freios para Automóveis Ltda.
Caixa Postal 5776, Av. Amaral Aguiaze
Sao Paulo, 01000 300-2130
Tel.: Brasil

WABCO Freni Vocoit Industriali S.p.A.
Via Pier Carlo Boggio n. 20
Torino, Italy 1-10138
Tel.: 39.02.94

WABCO Westinghouse
Mont 13-16, Postbus 28, Cassiopeia 3rd
Leiden, The Netherlands
Tel.: 02-40-68

WABCO Westinghouse A.B.
Box Agnestrandsgatan, 188
Malmo, Sweden S-21375
Tel.: 35.83.30

WABCO Westinghouse A.G.
30a Freiburgstrasse
Berne-Bumpitz,
Switzerland CH-3018
Tel.: 31.994.141

WABCO Westinghouse G.m.b.H.
Hochstadtstrasse 1, Postfach 49
Vienna, Austria A-1200
Tel.: 33.16.11

WABCO Westinghouse S.A.
2 Blvd. Westinghouse, Boite Postale 2
Frameries-Belgique
B-6070, 65.74.300.60.00
Tel.: France

AMERICAN STERILIZER COMPANY
(See AMSCO-American Sterilizer Co.)

•
AMERICAN STORES COMPANY
(Merger of Skaggs Cos., Inc. & American Stores Co.)
One Rollins Pl., Wilmington, DE 19803
Tel.: 302-571-8733 DE
ASC—(NYSE Ps Ph)
Approx. Sls.: $6,000,000,000 *Emp.:* 51,000
Foods, Sundries & Drugs
L. S. Skaggs *(Chm. Bd.)*
William R. Deeley *(Pres. & Chief Exec. Officer)*
John G. C. Fuller *(V.P. & Treas.)*
John W. Eastman *(V.P. & Sec.)*
Thomas Sunday *(Exec. V.P. & Counsel)*
Jones, Waldo, Holbrook & McDonough *(Legal)*
800 Walker Bank Bldg.
Salt Lake City, UT 84111
801-521-3200

Subsidiaries:
Acme Markets, Inc.
124 N. 15th St.
Philadelphia, PA 19139
Tel.: 215-569-3010

The Alpha Beta, Inc.
777 S. Harbor Blvd.
La Habra, CA 90631
Tel.: 714-871-3121

Haggen Northern, Inc.
900 John F. Kennedy Blvd.
Philadelphia, PA 19102
Tel.: 215-563-6375

Rite Aid Dental Drug, Inc.
4th & Orange Sts.
Harrisburg, PA 17101
Tel.: 717-473-3411

Skaggs Companies, Inc.
210 Beacon Dr.
Salt Lake City, UT 84115
Tel.: 801-467-4531

Subsidiaries:
Bunting Investors, Inc.
210 Beacon Dr.
Salt Lake City, UT 84115 (UT)
Tel.: 801-467-4531 (100%)
Photo Processing

Imperial Advertising Co.
210 Beacon Dr.
Salt Lake City, UT 84115 (MO)
Tel.: 801-467-4531 (100%)
Advertising Agency

Katz Drug Co.
210 Beacon Dr.
Salt Lake City, UT 84115 (DE)
Tel.: 801-467-4531 (100%)

S.K.A., Inc.
210 Beacon Dr.
Salt Lake City, UT 84115 (NV)
Tel.: 801-467-4531 (100%)
Airplane Ownership

Skaggs Drug Centers, Inc.
210 Beacon Dr.
Salt Lake City, UT 84115 (UT)
Tel.: 801-467-4531 (100%)
Real Estate Investments

Skaggs Laboratories, Inc.
210 Beacon Dr.
Salt Lake City, UT 84115 (UT)
Tel.: 801-467-4531 (100%)

Skaggs Properties, Inc.
210 Beacon Dr.
Salt Lake City, UT 84115 (DE)
Tel.: 801-467-4531 (100%)
Real Estate Investments

Skaggs Supercenters
210 Beacon Dr.
Salt Lake City, UT 84115 (TX)
Tel.: 801-467-4531 (100%)
John Hanson *(Chief Opr. Officer)*

Transcontinental Air Service, Inc.
210 Beacon Dr.
Salt Lake City, UT 84115 (UT)
Tel.: 801-467-4531 (100%)
Airplane
John Brewster *(Chief Opr. Officer)*

•
AMERICAN TECHNICAL INDUSTRIES INC.
29 Elm Ave., Mt. Vernon, NY 10550
Tel.: 914-668-9306 NY
ATM—(ASE)
Approx. Sls.: $35,000,000 *Emp.:* 700
Mfr. of Machinery, Machine Parts & Artificial Christmas Trees
Harry Gantz *(Chm. Bd.)*
Warren Hovnick *(Pres. & Chief Exec. Officer)*
Irwin Katz *(Treas. & V.P.-Fin.)*
Sylvia Adams *(Sec.)*
Marshall, Bratter, Greene, Allison & Tucker *(Legal)*
430 Park Ave.
New York, NY 10022
212-421-7200

Divisions:
ABM of Texas
4211 So. Congress Ave.
Austin, TX 78745
Tel.: 512-444-1866 (100%)
Machinery & Parts Mfg. & Assembly
Harry Sargent *(Plant Mgr.)*

American Technical Machinery Div.
Main St.
Barnesville, PA 18047
Tel.: 717-668-6381
Machinery & Parts Mfg. & Assembly
Charles Dunlap *(Plant Mgr.)*

American Technical Machinery Div.
1484 Jingle Bell Lane
Lexington, KY 40505
Tel.: 606-254-3871 (100%)
Machinery & Parts Mfg. & Assembly

American Tree & Wreath Div.
1484 Jingle Bell Lane
Lexington, KY 40505
Tel.: 606-254-3871 (100%)
Machinery & Parts Mfg. & Assembly
Alexander Carlisle *(V.P.)*

American Tree & Wreath Div.
Jingle Bell Lane
W. Conesville, NY 12192
Tel.: 518-731-8141 (100%)
Machinery & Parts Mfg. & Assembly
Peter Cissell *(Plant Mgr.)*

American Tree & Wreath Div.
Jingle Bell Lane, Rte. 4
Americus, GA 31709
Tel.: 912-924-1200
Mfr. Artificial Christmas Trees
Ted Knight *(Plant Mgr.)*

American Tree & Wreath Div.
320 Gale St.
Aurora, IL 60506
Tel.: 312-897-6510
Machinery & Parts Mfg. & Assembly
Anthony De Cosmo *(Plant Mgr.)*

American Tree & Wreath Div.
4211 S. Congress Ave.
Austin, TX 78745
Tel.: 512-444-1866 (100%)
Machinery & Parts Mfg. & Assembly
Harry Sargent *(Plant Mgr.)*

American Tree & Wreath of California Div.
3401 Edwards Ave.
Mira Loma, CA 91752
Tel.: 714-685-1571
Machinery & Parts Mfg. & Assembly
Howard Clarough *(Plant Mgr.)*

Subsidiary:
American Deco-Plaque, Inc.
4600 E. 11th Ave.
Hialeah, FL 33013 (FL)
Tel.: 305-691-6618 (100%)
Mfr. Plastic Decorative Plaques
Tom Kuroka *(Plant Mgr.)*

•
AMERICAN TELEPHONE & TELEGRAPH CO.
195 Broadway, New York, NY 10007
Tel.: 212-393-9600 NY
T—(NYSE Bo Ci MW Ph PS)
Approx. Rev.: $41,000,000,000 *Emp.:* 984,044
Holding Co.—Communications
Charles L. Brown *(Chm. Bd. & Chief Exec. Officer)*
William M. Ellinghaus *(Pres. & Chief Opr. Officer)*
William G. Burns *(V.P. & Treas.)*
William S. Cashel, Jr. *(Vice Chm. Bd. & Chief Fin. Officer)*
Frank A. Hutson, Jr. *(Sec.)*
F. Mark Garlinghouse *(Legal)*

Division:
American Telephone & Telegraph Co.
Long Lines Dept.
Bedminster, NJ 07921
Tel.: 201-234-3000 (100%)

Subsidiaries:
The Bell Telephone Co. of Pa.
One Parkway
Philadelphia, PA 19102
Tel.: 215-466-8000 (100%)
Communications Co.

Bell Telephone Labs., Inc.
600 Mountain Ave.
Murray Hill, NJ 07974
Tel.: 201-582-3000 (100%)
Communications Co.

The Chesapeake & Potomac Telephone Co.
930 H St. N.W.
Washington, DC 20001
Tel.: 202-393-9900 (100%)
Communications Co.

The Chesapeake & Potomac Telephone Co. of Maryland
Charlestown Plaza, 1 E. Pratt St.
Baltimore, MD 21202
Tel.: 301-333-5000 (100%)
Communications Co.

The Chesapeake & Potomac Telephone Co. of Virginia
703 E. Grace St.
Richmond, VA 23219
Tel.: 804-775-2000 (100%)
Communications Co.

The Chesapeake & Potomac Telephone Co. of West Virginia
1600 MacCorkle Ave. S.E.
Charleston, WV 25314
Tel.: 304-343-6611 (100%)
Communications Co.

The Diamond State Telephone Co.
One Parkway
Philadelphia, PA 19102
Tel.: 215-466-8000 (100%)
Communications Co.

Illinois Bell Telephone Co.
225 W. Randolph St.
Chicago, IL 60606
Tel.: 312-727-6411 (100%)
Communications Co.

Indiana Bell Telephone Co., Inc.
240 N. Meridian St.
Indianapolis, IN 46204
Tel.: 317-265-8200 (100%)
Communications Co.

Michigan Bell Telephone Co.
444 Michigan Ave.
Detroit, MI 48226
Tel.: 313-223-9900 (100%)
Communications Co.

The Mountain States Telephone & Telegraph Co.
931 14th St.
Denver, CO 80202
Tel.: 303-624-2424 (85.8%)
Communications Co.

New England Telephone & Telegraph Co.
185 Franklin St.
Boston, MA 02107
Tel.: 617-743-9900 (89%)
Communications Co.

New Jersey Bell Telephone Co.
540 Broad St.
Newark, NJ 07101
Tel.: 201-649-9800 (100%)
Communications Co.

New York Telephone Co.
1095 Ave. of the Americas
New York, NY 10036
Tel.: 212-395-2121 (100%)
Communications Co.

Northwestern Bell Telephone Co.
121 S. 19th St.
Omaha, NE 68102
Tel.: 402-422-2000 (100%)
Communications Co.

The Ohio Bell Telephone Co.
100 Erieview Plaza
Cleveland, OH 44114
Tel.: 216-822-9700 (100%)
Communications Co.

Pacific Northwest Bell Telephone Co.
Sixteen Hundred Bell Plaza
Seattle, WA 98191
Tel.: 206-345-2211 (88.7%)
Communications Co.

continued next page

ATTACHMENT 2

AMERICAN TELEPHONE & TELEGRAPH CO.—(continued)

The Pacific Telephone & Telegraph Co.
140 New Montgomery St.
San Francisco, CA 94105
Tel.: 415-542-9000 (99.9%)
Communications Co.

Subsidiary:
Bell Telephone Co. of Nevada
645 E. Plumb Lane
Reno, NV 89502
Tel.: 702-789-5500 (100%)
Communications Co.

South Central Bell Telephone Co.
P. O. Box 771
Birmingham, AL 35201
Tel.: 205-307-1000 (100%)
Communications Co.

Southern Bell Telephone & Telegraph Co.
Hurt Bldg., P.O. Box 2011
Atlanta, GA 30301
Tel.: 404-529-8611 (100%)
Communications Co.

Southwestern Bell Telephone Co.
1010 Pine St.
St. Louis, MO 63101
Tel.: 314-247-2000 (100%)
Communications Co.

Western Electric Co., Inc.
222 Broadway
New York, NY 10038
Tel.: 212-571-2346 (100%)

Subsidiaries:
Manufacturers' Junction Railway Co.
Cicero & Cermak
Cicero, IL 60650
Tel.: 312-484-3000
Shortline Railroad

Nassau Recycle Corp.
Fairchild Pl.
Gaston, SC 29053
Tel.: 803-794-4700 (100%)

Sandia Corp.
Sandia Base
Albuquerque, NM 87115
Tel.: 505-844-4045 (100%)

Teletype Corp.
5555 Touhy Ave.
Skokie, IL 60076
Tel.: 312-982-2000 (100%)

Wisconsin Telephone Co.
722 N. Broadway
Milwaukee, WI 53202
Tel.: 414-456-3000 (100%)
Communications Co.

* **THE AMERICAN THREAD COMPANY**
(Sub. (75%) of Tootal Ltd., Manchester, England)
High Ridge Park, Stamford, CT 06905
Tel.: 203-329-8111 NJ
Approx. Sls.: $117,897,222 Emp.: 3,500
Mfg. & Sales of Thread, Cotton & Sheath
Robert F. Lilley (Pres., Chief Opr. Officer & Chief Exec. Officer)
James Harrison (Fin. Dir.)
C. T. Hutchinson (Pers. Dir.)
Ropes & Gray (Legal)
225 Franklin
Boston, MA 02110
617-423-6100

Subsidiaries:
Model Corp., Inc.
211 W. Shields
Fresno, CA 93706 (DE)
Tel.: 209-224-6863 (100%)
Emp.: 6
Clifton Brown
L. David Garrett (Chief Opr. Officer)

Cotton Printers Assn. (U.S.A.) Ltd.
Williamsburg, CT 06095 (NY)
Tel.: 203-423-5571 (100%)
Emp.: 4
Thread Sales
Edward Morris (Chief Opr. Officer)

* **AMERICAN WATER WORKS COMPANY, INC.**
3000 Kennett Pike,
Wilmington, DE 19807
Tel.: 1-800-1581 DE
AWK—(NYSE Ptg)
Approx. Sls.: $216,884,000 Emp.: 3,362
Water Utility Holding Co.
John H. Ware, 3rd (Chm. Bd.)
John A. Gubelmann (Pres.)
Loren D. Mathonnart (Treas.)
Henry A. Reddie, Jr. (Sec.)

Subsidiaries:
Alton Water Co.
300 Henry St.
Alton, IL 62002 (IL)
Tel.: 618-465-6671 (99.50%)
Approx. Sls.: $2,906,000
Emp.: 43
Water Utility
Glen W. Thornburg (Chief Opr. Officer)

Bluefield Valley Water Works Co.
100 Princeton Ave.
Bluefield, WV 24701 (WV)
Tel.: 304-327-6137 (100%)
Approx. Sls.: $12,000
Water Utility
Edward W. Lumbach (Chief Opr. Officer)

Bristol County Water Co.
40 Bradford St.
Bristol, RI 02809 (RI)
Tel.: 401-253-5210 (99.60%)
Approx. Sls.: $1,321,000
Emp.: 27
Water Utility
James L. Rodgers, Jr. (Chief Opr. Officer)

The Cairo Water Co.
618 Commercial Ave.
Cairo, IL 62914 (IL)
Tel.: 618-734-1211 (100%)
Approx. Sls.: $346,000
Emp.: 10
Water Utility
Glen W. Thornburg (Chief Opr. Officer)

California-American Water Co.
2632 Hamner Ave.
National City, CA 92050 (CA)
Tel.: 714-477-2700 (100%)
Approx. Sls.: $11,206,000
Emp.: 143
Water Utility
Charles L. Benz (Chief Opr. Officer)

Canton Water Works Co.
130 Fifth Ave. S.
Canton, IA 52728 (DE)
Tel.: 319-242-0883 (100%)
Approx. Sls.: $1,284,000
Emp.: 21
Water Utility
Glen W. Thornburg (Chief Opr. Officer)

Commonwealth Water Co.
200 Center Brook Rd.
Short Hills, NJ 07078 (NJ)
Tel.: 201-376-6600 (100%)
Approx. Sls.: $10,486,000
Emp.: 119
Water Utility
William R. Cobb (Chief Opr. Officer)

Connecticut-American Water Co.
20 Milton St.
E. Dedham, MA 02026 (CT)
Tel.: 617-326-3363 (100%)
Approx. Sls.: $4,622,000
Emp.: 72
Water Utility
James L. Rodgers, Jr. (Chief Opr. Officer)

Davenport Water Co.
130 E. 2nd St.
Davenport, IA 52805 (DE)
Tel.: 319-324-5254 (87.22%)
Approx. Sls.: $4,163,000
Emp.: 58
Water Utility
Glen W. Thornburg (Chief Opr. Officer)

Dedham Water Co.
20 Milton St.
E. Dedham, MA 02026 (MA)
Tel.: 617-326-3120 (100%)
Approx. Sls.: $1,219,000
Emp.: 26
Water Utility
James L. Rodgers, Jr. (Chief Opr. Officer)

The Hampton Water Works Co.
92 High St.
Hampton, NH 03842 (NH)
Tel.: 603-929-3310 (100%)
Approx. Sls.: $668,000
Emp.: 12
Water Utility
James L. Rodgers, Jr. (Chief Opr. Officer)

Hershey Water Co.
915 E. Arch St.
Palmyra, PA 17078 (PA)
Tel.: 717-838-5621 (100%)
Approx. Sls.: $1,048,000
Emp.: 12
Water Utility
Donald T. Burr (Chief Opr. Officer)

Hingham Water Co.
20 South St.
Hingham, MA 02043 (MA)
Tel.: 617-749-0801 (100%)
Approx. Sls.: $1,278,000
Emp.: 24
Water Utility
James L. Rodgers, Jr. (Chief Opr. Officer)

Huntington Water Corp.
700 4th Ave.
Huntington, WV 25716 (DE)
Tel.: 304-523-8453 (100%)
Approx. Sls.: $6,089,000
Emp.: 79
Water Utility
Edward W. Lumbach (Chief Opr. Officer)

Illinois-American Water Co.
4709 State St.
E. St. Louis, IL 62203 (IL)
Tel.: 618-874-3600 (99.97%)
Approx. Sls.: $11,777,000
Emp.: 169
Water Utility
Glen W. Thornburg (Chief Opr. Officer)

Joplin Water Works Co.
7th & Joplin Sts.
Joplin, MO 64801 (MO)
Tel.: 417-623-2100 (100%)
Approx. Sls.: $1,860,000
Emp.: 36
Water Utility
Glen W. Thornburg (Chief Opr. Officer)

Kentucky-American Water Co.
2300 Richmond Rd.
Lexington, KY 40502 (KY)
Tel.: 606-269-2300 (100%)
Approx. Sls.: $6,561,000
Emp.: 113
Water Utility
J. James Barr (Chief Opr. Officer)

Keystone Water Co.
114 S. Friary St.
Milton, PA 17847 (PA)
Tel.: 717-742-4001 (100%)
Approx. Sls.: $8,807,000
Emp.: 153
Water Utility
Donald T. Burr (Chief Opr. Officer)

Kokomo Water Works Co.
1801 S. E. Joseph St.
Kokomo, IN 46901 (IN)
Tel.: 317-457-5641 (100%)
Approx. Sls.: $2,219,000
Emp.: 40
Water Utility
J. James Barr (Chief Opr. Officer)

The Marion Water Co.
616 E. Church St.
Marion, OH 43302 (OH)
Tel.: 614-387-3003 (100%)
Approx. Sls.: $2,619,000
Emp.: 61
Water Utility
J. James Barr (Chief Opr. Officer)

The Maryland Water Works Co.
45 N. Main St.
Bel Air, MD 21014 (MD)
Tel.: 301-838-3400 (100%)
Approx. Sls.: $603,000
Emp.: 11
Water Utility
Donald T. Burr (Chief Opr. Officer)

Massachusetts-American Water Co.
20 Milton St.
E. Dedham, MA 02026 (MA)
Tel.: 617-326-5363 (100%)
Approx. Sls.: $799,000
Emp.: 14
Water Utility
James L. Rodgers, Jr. (Chief Opr. Officer)

Monmouth Consolidated Water Co.
501 Shrewsbury Ave.
Shrewsbury, NJ 07701 (NJ)
Tel.: 201-842-8800 (100%)
Approx. Sls.: $11,400,000
Emp.: 133
Water Utility
Wm. R. Cobb (Chief Opr. Officer)

Muncie Water Works Co.
Main & Elm Sts.
Muncie, IN 47305 (IN)
Tel.: 317-288-6672 (100%)
Approx. Sls.: $3,891,000
Emp.: 50
Water Utility
J. James Barr (Chief Opr. Officer)

New Jersey Water Co.
600 Grove St.
Haddon Heights, NJ 08035 (NJ)
Tel.: 609-547-1700 (100%)
Approx. Sls.: $15,848,000
Emp.: 160
Water Utility
Wm. R. Cobb (Chief Opr. Officer)

Ohio-American Water Co.
1710 Sylvan Hoon Dr.
Richmond, IN 47374 (OH)
Tel.: 317-962-3811 (100%)
Approx. Sls.: $2,326,000
Emp.: 35
Water Utility
J. James Barr (Chief Opr. Officer)

The Ohio Cities Water Co.
100 E. Perry St.
Tiffin, OH 44883 (OH)
Tel.: 419-447-4621 (100%)
Approx. Sls.: $969,000
Emp.: 19
Water Utility
J. James Barr (Chief Opr. Officer)

The Oxford Water Co.
3 Howe Ave.
Millbury, MA 01527 (MA)
Tel.: 617-865-2664 (100%)
Approx. Sls.: $390,000
Water Utility
James L. Rodgers, Jr. (Chief Opr. Officer)

Paradise Valley Water Co.
6250 N. 58th St.
Scottsdale, AZ 85252 (AZ)
Tel.: 602-946-5410 (100%)
Approx. Sls.: $863,000
Emp.: 12
Water Utility
Charles L. Benz (Chief Opr. Officer)

Peoria Water Co.
126 S. W. Monroe St.
Peoria, IL 61601 (IL)
Tel.: 309-671-3700 (97.79%)
Approx. Sls.: $6,300,000
Emp.: 127
Water Utility
Glen W. Thornburg (Chief Opr. Officer)

(continued next page)

NINETY-SIXTH CONGRESS

FRANK THOMPSON, JR., N.J., CHAIRMAN

LEROY H. ROSER, MICH.
JOHN DRAGOMAN, IND.
AUGUSTUS F. HAWKINS, CALIF.
FRANK ARRINGS, N.J.
JOSEPH M. GAYDOS, PA.
ED JONES, TENN.
ROBERT H. MELLOWAN, W. VA.
LIONEL VAN DEERLIN, CALIF.
JOSEPH G. MINISH, N.J.
MICHAEL J. DAVIS, S.C.
CHARLES ROSE, N.C.
JOHN L. BURTON, CALIF.
LEON E. PANETTA, CALIF. (AT LARGE)
PETER A. PEYSER, N.Y.
WILLIAM R. RATCHFORD, CONN.
AL DUFFY, WASH.

WILLIAM L. DICKINSON, ALA.
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BILL FRENZEL, MINN.
DAVE STOCKMAN, MICH.
ROBERT E. BAUMAN, CALIF.
NEWT GINGRICH, GA.
JERRY LEWIS, CALIF.
CARROLL A. CAMPBELL, JR., S.C.
TOM LOEFFLER, TEX.

WILLIAM C. PHILLIPS, STAFF DIRECTOR
HUGH G. DUFFY, GENERAL COUNSEL

RECEIVED
ACC # 990
'80 APR 11 PM 12:34

Congress of the United States
House of Representatives
COMMITTEE ON HOUSE ADMINISTRATION
SUITE H-326, U.S. CAPITOL
Washington, D.C. 20515

April 10, 1980

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Charlie:

This letter is in response to a request from the former General Counsel, William C. Oldaker, for a copy of any documents which relate to the present language of 2 U.S.C. Section 441b(b)(6), which language appears to have been added by the House/Senate conferees during their conference on the Federal Election Campaign Act Amendments of 1976, P. L. 94-283.

Since the information requested transpired during the 94th Congress the records had to be retrieved from the National Archives. Through numerous conversations between my secretary and Ms. Leta Holley from the FEC Library, it was agreed, after review of the files, that the information requested was not included in these particular files.

With kind regards,

007401

Cordially,

Hugh

Hugh G. Duffy
General Counsel

HGD:j

80 APR 11 A3:15

HOR947

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

October 17, 1979

Mr. Robert Moss, General Counsel
Committee on House Administration
U. S. House of Representatives
Washington, D. C. 20515

Dear Mr. Moss: Bob

Pursuant to discussions between our respective staffs, I hereby request that the Commission be provided a copy of any documents which relate to the present language of 2 U.S.C. § 441b(b)(6), which language appears to have been added by the House/Senate conferees during their conference on the Federal Election Campaign Act Amendments of 1976, P.L. 94-283. The House bill was H.R. 12406.

Our study of the transcripts of the Conference Committee debates suggests that the present language of 2 U.S.C. § 441b(b)(6) first appeared as part of a substitute package offered in the conference by Mr. Hays of Ohio, who was Chairman of the Committee on House Administration (and of the House conferees) at that time. In an effort to properly interpret that language in light of its legislative history with respect to several matters under review by the Commission, we are attempting to confirm the origin of the language and to obtain any information relevant thereto.

It is my understanding that the 1976 records of the Committee on House Administration are in the custody of the Archives of the United States, but subject to recall at the Committee's direction. I therefore request that the Committee take whatever action is required in order for the requested information to be made available to the Commission.

Thank you for your attention to this matter.

Sincerely,

Bill

William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE by pc

DATE: SEPTEMBER 12, 1979

SUBJECT: MUR 947 - Interim Investigative Report dated 9-10-79; Received in OCS 9-11-79, 10:52

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, September 11, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline,

September 11, 1979

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 947

Please have the attached Interim Invest Report on MUR 947 distributed to the Commission.

Thank you.

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

9 SEP 11 A10: 52

In the Matter of	)	
	)	MUR 947
American Telephone and Telegraph Company	)	
	)	

INTERIM INVESTIGATIVE REPORT

On July 2, 1979, we received AT&T's response to our RTB notification. We have analyzed that response and now are prepared to present the Commission with a recommendation for further action in the matter.

Recently, responsibility for MUR 994, which presented the same issue as was raised in MUR 947, was transferred to the enforcement team which is handling MUR 947. Since the respondent corporation in MUR 994 is a subsidiary of AT&T, we thought it would be provident to consider those matters set out in their response to RTB before moving ahead with MUR 947. That response should be forthcoming no later than September 10, 1979.

9/10/79
Date

William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE by gp

DATE: JULY 20, 1979

SUBJECT: MUR 947 - Interim Investigative Report dated 7-18-79, Received by OCS 7-18-79, 1:39

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 11:00, July 19, 1979.

There were no objections to the Interim Investigative Report.

July 18, 1979

MEMORANDUM TO: Marge Emmons

FROM; Elissa T. Garr

SUBJECT: MUR 947

Please have the attached Interim Invest Report on MUR 947 distributed to the Commission.

Thank you.

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

79 JUL 18 P1: 39

In the Matter of	)	MUR 947
	)	
American Telephone and	)	
Telegraph Company	)	

INTERIM INVESTIGATIVE REPORT

On June 5, 1979, the Commission found reason to believe that the American Telephone and Telegraph Company (AT&T) violated 2 U.S.C. § 441b(b)(6).

The respondent received our letter of notification on June 12, and responded thereto by letter dated July 2.

We now are in the process of reviewing the information contained in that response and will propose further action to the Commission upon its completion.

7/18/79
Date

William C. Oldaker
General Counsel

GCC
10477

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

John W. Gray, Jr.
Assistant Vice President and Attorney

~~79 JUN 1~~ P 3: 23

AT&T
American Telephone and
Telegraph Company
2000 L Street, Northwest
Washington, D. C. 20036
Phone (202) 457-3843

July 2, 1979

79 JUL 2 P 3: 23

William C. Oldaker, Esquire
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Re: MUR 947

Dear Mr. Oldaker:

This is in response to your letter dated June 7, 1979, notifying American Telephone and Telegraph Company (AT&T) of a complaint filed by Glenn E. Watts, President of the Communications Workers of America (CWA), alleging a violation by AT&T of the Federal Election Campaign Act of 1971, as amended.

The Bell System is composed of American Telephone and Telegraph Company and its subsidiaries and affiliated companies, including the various operating telephone companies. AT&T's ownership of its subsidiary and affiliated corporations ranges from 100% to less than 20%. These are substantial companies of which 11 have between 25,000 and 90,000 employees each and two have more than 100,000 employees each.

On June 12, 1978, Mr. Rex Reed, Vice President of AT&T, wrote Mr. Watts pointing out that there is no single political action committee for AT&T and its subsidiaries and affiliated companies, but rather the decision whether to create such a committee rests with each individual company (a copy of Mr. Reed's letter was attached to your letter of June 7, 1979). There are presently 20 federal Political Action Committees (PACs) which have been created by Bell System affiliated companies. Those companies which have organized PACs are listed in Attachment I and those which do not have PACs are listed in Attachment II.

Mr. Reed's letter explained that those companies having PACs, all of which utilize some method of payroll deduction for collecting the political contributions of their employees, will make available to the CWA, at cost, their payroll deduction method to facilitate the making of voluntary political contributions.

There are differences among the various Bell System companies as to the type of payroll deduction methods utilized for PACs, depending upon the payroll system used by a particular company. As Attachment III indicates, the equipment, method of data entry, and the sophistication of each payroll system varies. Each company has tailored its payroll deduction system to its own system's requirements and to the needs of the company's PAC. Additionally, each company's federal PAC is separately organized, has been separately registered with the Federal Election Commission, has separate officers, is separately administered and prepares and files its own reports. Because, among other reasons, there is no uniform payroll deduction system, it is our position that the CWA should deal directly with each Bell System company having a PAC, as CWA has recently done with the Chesapeake & Potomac Telephone Companies. The agreement reached by CWA and the Chesapeake & Potomac Telephone Companies (see Attachment IV) demonstrates the logic of implementing payroll deduction systems on a company by company basis.

As to the alleged violation of 2 U.S.C. § 441b (b)(6), it is our position that this section does not require those Bell System Companies, even though a subsidiary or affiliate of AT&T, that do not have PACs (and whose payroll systems do not, therefore, provide for payroll deductions for political contributions) to modify their payroll systems in such a manner as to establish for the CWA a method of payroll deduction for political contributions by its membership. We submit that the intent of the statute is that when a corporation, whether an affiliate or subsidiary of the parent corporation, maintains a uniform payroll system which provides for payroll deductions for political contributions to a PAC (and thereby could accommodate, on a "company-wide" basis, payroll deductions for its employees represented by a labor organization) then and only then is that corporation required to extend to a labor organization the use of its payroll withholding method in all of its affiliates, subsidiaries, departments, divisions, etc., for collecting voluntary political contributions.

To fulfill CWA's request in the four companies that do not have PACs is not a simple matter of adding a few names to an existing PAC payroll deduction system. Since each of the four companies has a different payroll system (see Attachment III), each company's payroll system would have to be modified to accommodate and develop a new payroll deduction system. Our interpretation, that the statute does not contemplate such action, is consistent with the purpose of the statute--to make available to the union PAC any payroll deduction

system available to the corporation's PAC. (See House Conference Report No. 94-1057, 94th Congress 2d Sess. at p. 62.)*

In view of the foregoing, it is submitted that the complaint lodged by the CWA is without merit and should be dismissed. If we can furnish you any further information, please let me know.

Respectfully yours,

John W. Gray, Jr.

John W. Gray, Jr.
Assistant Vice President
and Attorney

Attachments

*This interpretation is also consistent with your letter of June 7 where you speak of the alleged failure of AT&T "to make available to CWA, on a company-wide basis, the payroll deduction method for the making of voluntary contributions that is utilized in several AT&T subsidiaries." (emphasis added)

ATTACHMENT I

Major Bell System Units with PACs

Company Name	Company PAC
American Telephone & Telegraph Co. General Departments	American Telephone Political Action Committee
American Telephone & Telegraph Co. Long Lines	American Telephone & Telegraph Company, Long Lines Employee Political Action Committee
Bell Telephone Company of Pennsylvania	Bell of Pennsylvania Political Action Committee
Chesapeake & Potomac Telephone Co.	C&P Federal Political Action Committee
Cincinnati Bell, Inc.	Cincinnati Bell Federal Political Action Committee
The Diamond State Telephone Co.	Diamond State Telephone Political Action Committee
Indiana Bell Telephone Co., Inc.	Indiana Bell Political Action Committee
Michigan Bell Telephone Company	Michigan Bell Political Action Committee
Mountain Bell Telephone Company	Mountain Bell Employee Active Citizenship Program
New England Telephone & Telegraph Co.	New England Telephone Federal Political Action Committee
New York Telephone Company	New York Telephone Federal Political Action Committee
Northwestern Bell Telephone Co.	Northwestern Bell Federal Political Action Committee
Ohio Bell Telephone Company	Ohio Bell Federal Political Action Committee
Pacific Northwest Bell Telephone Co.	Pacific Northwest Bell Employee Public Interest Committee
Pacific Telephone Company	Pacific Telephone Federal Political Action Committee
South Central Bell Telephone Co.	South Central Bell Federal Political Action Committee

Attachment I - Cont'd

Company Name	Company PAC
Southern Bell Telephone & Telegraph Company	Southern Bell Federal Political Action Committee
Southwestern Bell Telephone Company	Southwestern Bell Employee Federal Political Action Committee
Western Electric Company, Inc.	Western Electric Political Action Committee
Wisconsin Telephone Company	Wisconsin Telephone Company Federal Political Action Committee

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ATTACHMENT II

Major Bell System Units without PACs

Bell Telephone Laboratories, Inc.

Illinois Bell Telephone Company

New Jersey Bell Telephone Company

Southern New England Telephone Company

ATTACHMENT III

COMPARISON OF BELL SYSTEM COMPANY PAYROLL SYSTEMS

	AT&T CEN	AT&T LL	PA	C&P	CINN	DIAMOND	IND	MICH	MIN	NET	NY	NW	OH	PNW	PAC	SoC	SO	SW	WE	WTS	4 COMPANIES W/O PACs STL	ILL	NJ	SNE
1. Maker of Data Entry Equip. (See legend at bottom)	4-PH	ENT	4-PH	HW	UNI	4-PH	INFO	CMC	IBM	INFO	INFO	INFO	UNI	IBM	BUR	UNI	CMC	UNI	IBM	UNI	IBM	BELL	UNI	IBM
2. Mode of entry (KP=keypunch, KTD=key tape/disk, TER=terminal)	KTD	KTD	KTD	KTD	KP	KTD	KTD	KTD	TER	KTD	TER	KTD	KP	KP	KTK	KTD	KTD	KTD	PTD	KP	TER	TER	KTD	KTD
3. Maker of computer equipment (See legend at bottom)	AMD	IBM	IBM	IBM	IBM	IBM	IBM	BUR	IBM	IBM	IBM	HW	IBM	AMD	BUR	IBM	FOR	IBM	IBM	IBM	IBM	IBM	IBM	AMD
4. Generation of computer (2nd, 3rd, 3+)	3+	3+	3	3+	3	3	3+	3	3	3	3	2	3+	3	3+	3	2	3	3	3+	3	3+	3	3+
5. Master file characteristics																								
a. access method (SEQ= sequential, RAN=random)	SEQ	SEQ	SEQ	SEQ	SEQ	SEQ	RAN	RAN	RAN	SEQ	SEQ	SEQ	SEQ	SEQ	RAN	RAN	SEQ	SEQ	SEQ	SEQ	SEQ	RAN	SEQ	SEQ
b. storage medium (TP=tape, DK=disk)	DK	DK	DK	TP	TP	DK	DK	DK	DK	DK	DK	TP	DK	TP	DK	DK	TP	TP	DK	TP	DK	DK	TP	DK
c. data base organization (yes, no)	NO	NO	NO	NO	NO	NO	NO	NO	NO	YES	YES	NO	NO	NO	NO	YES	NO	NO	NO	NO	YES	YES	NO	NO
6. Number of times each month PAC deductions made: (1=once; 2=twice; etc.)																								
a. Biweekly paid employees	-	-	-	-	-	-	-	-	1	-	-	-	1	-	-	-	-	-	-	-				
b. Semimonthly paid employees	2	-	1	2	1	1	2	-	-	1	-	2	-	1	1	1	1	2	-	-		NO PACs		
c. Monthly paid employees	1	1	-	1	1	-	1	1	-	1	1	-	1	-	-	-	-	-	1	1				
7. Number of times each month union dues deductions made (1=once, 2=twice, etc. PP=each payroll period)																								
a. Weekly paid employees	1	PP	PP	PP	PP	PP	4	PP	-	PP	PP+4	-	-	-	-	1	4	-	PP+1+4	2	PP	1+2	PP+4	4
b. Biweekly paid employees	-	-	-	-	-	-	-	-	PP	-	-	2	PP	1	1	1	2	1+2	-	2	-	PP+1+2	-	-
c. Semimonthly paid employees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-
d. Monthly paid employees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-

IBM=IBM; UNI=Univac; HW=Honeywell; BELL=Bell System; INFO=Inforex; 4-PH=Four phase; BUR=Burroughs; CMC=CMC; FOR=Formation (RCA); AMD=Amdahl; ENT=Entrex

Attachment IV

C&P Telephone

L. E. Dyer
Vice President

1710 H Street, N. W.
Washington, D. C. 20006
Phone (202) 392-3307

June 26, 1979

Mr. George R. Strick
Vice President
District 2
Communications Workers of America
1015 20th Street, N.W.
Washington, D.C. 20036

Dear Mr. Strick:

This is to confirm our understanding of June 26, 1979 with regard to the conditions under which the C&P Telephone Companies agree to make available to the Communications Workers of America methods of soliciting voluntary contributions and/or facilitating the making of voluntary contributions to the CWA-COPE Political Contributions Committee, Secretary-Treasurer, C.W.A. (CWA-COPE-PCC), under the Federal Election Campaign Act Amendments of 1976.

1. The parties agree to the conditions of the allotment program as set forth in Attachment 1, "Summary of the CWA-COPE-PCC Allotment Program" and Exhibit 1 thereto.

2. The parties further agree that the Company assumes no responsibility in connection with the allotment except that of collecting and forwarding monies to the CWA-COPE-PCC, Secretary Treasurer, C.W.A. The Union indemnifies the Company and holds it harmless from all claims, damages, costs, fees or charges of any kind which may arise out of the honoring by the Company of deduction authorizations in accordance with the terms of this agreement, the making up of sums owed the Union in cases of inadvertent failure to timely honor authorizations and transmitting such deductions to the Secretary Treasurer, C.W.A.

3. Union solicitation of personal contributions to CWA-COPE-PCC on Company premises shall be limited to non-working hours and non-working spaces in accordance with Article 8 of the General Agreement.

4. The Union designates September 1979 as the initial enrollment period.

5. The Union agrees to pay the Company for actual clerical handling charges in connection with the establishment of the allotment program incurred during the initial enrollment period at the rate of $8.76 per clerical hour but not to exceed in total $2,150.00. In each and every month following the initial enrollment period during which the program continues, the Union agrees to pay to the Company the sum of fifty dollars ($50.00) for computer processing costs plus a fee of two cents ($0.02) per employee making an allotment during that month.

6. This agreement may be cancelled by the Union upon thirty days notice to the Company and shall be cancelled upon thirty days notice to the Union by the Company that the Company has discontinued its C&P Political Action Committee for management employees.

7. Please signify your agreement to the foregoing by signing your name in the space provided below and returning two signed copies to the Company. Two additional signed copies are enclosed for your records.

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY
OF MARYLAND

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY
OF VIRGINIA

THE CHESAPEAKE AND POTOMAC
TELEPHONE COMPANY
OF WEST VIRGINIA

By _____
Vice President - Personnel

THE COMMUNICATIONS WORKERS
OF AMERICA

By _____
Vice President - District 2

ATTACHMENT 1

SUMMARY OF THE CWA-COPE-PCC ALLOTMENT PROGRAM

1. Authorization Form - The Company will accept deduction authorizations from eligible employees in the bargaining unit in the form of Exhibit 1 attached. The Company will provide the Union with a detailed layout of the authorization form suitable for reproduction. The Union will supply deduction forms to employees at its own expense.

2. Frequency of Allotment - Allotments will be deducted weekly in the first four pay periods in the month. The minimum deduction shall be ten cents ($0.10) per week.

3. Date of Remittance - The Company shall remit allotments to the CWA-COPE Political Contributions Committee, Secretary-Treasurer, C.W.A. (whose address is 1015 20th St., N.W. Washington, D.C. 20036) by the 12th calendar day of the following month.

4. Effective Dates for Beginning and Change of Allotment - Deductions will begin or change in the first pay period ending in the month following receipt of the authorization. Authorizations are to be forwarded to the payroll office at least ten (10) working days prior to the first payroll period ending in the month in which the authorization is to be effective.

5. Effective Date of Cancellation - Cancellations shall be effective immediately upon receipt.

6. Action When the Employee Leaves the Company - Authorization is automatically cancelled when the employee leaves the employment of the C&P Company which has been authorized to make the deduction.

7. Action When Leave of Absence is Granted - The allotment will be automatically suspended when the employee goes on leave.

8. Action When the Employee Returns from Leave of Absence - The allotment will automatically be resumed with the first pay period ending in the month following the employee's return from leave.

9. Action When the Employee Retires - The allotment is automatically cancelled.

10. Action When the Employee is Transferred Out of the Bargaining Unit - The allotment is automatically cancelled.

11. Action in the Case of Insufficient Wages or Omitted Deduction - For any pay period in which the employee's pay (including sickness or accident disability payments) is not sufficient to permit the deduction for CWA-COPE-PCC (which shall be placed last in priority for all other authorized deductions) no makeup will be made in any subsequent pay period.

12. Paydraft Indication - The employee's paydraft will carry an indication of the CWA-COPE-PCC deduction.

ALLOTMENT AUTHORIZATION FORM

A two-part form with perforation for separating the "Union Copy" from the "Payroll Copy".

PLEASE PRINT YOUR

LAST NAME FIRST NAME INITIAL

I HEREBY AUTHORIZE THE C&P TELEPHONE COMPANY OF _____ TO DEDUCT FROM MY WAGES, IN ACCORDANCE WITH THE AGREEMENT BETWEEN THE COMPANY AND C.W.A. DATED JUNE ___, 1979, ALLOTMENTS WHICH ARE TO BE REMITTED TO THE CWA-COPE POLITICAL CONTRIBUTIONS COMMITTEE, SECRETARY-TREASURER, C.W.A. THIS AUTHORIZATION IS VOLUNTARILY MADE ON THE SPECIFIC UNDERSTANDING THAT THE SIGNING OF THIS AUTHORIZATION AND THE MAKING OF PAYMENTS TO CWA-COPE-PCC ARE NOT CONDITIONS OF MEMBERSHIP IN THE UNION OR OF EMPLOYMENT WITH THE COMPANY AND THAT CWA-COPE-PCC WILL USE THE MONEY IT RECEIVES TO MAKE POLITICAL CONTRIBUTIONS AND EXPENDITURES IN CONNECTION WITH FEDERAL, STATE AND LOCAL ELECTIONS. THIS AUTHORIZATION REVOKES AND SUPERSEDES ANY AUTHORIZATION PREVIOUSLY GIVEN BY ME.

COPY FOR PAYROLL OFFICE.

CWA LOCAL NO | | | | | | | Form

1. ENTER SOCIAL SECURITY NUMBER HERE →

2. ENTER AMOUNT TO BE DEDUCTED MONTHLY TO CANCEL ENTER 000.00.

Monthly Amount		PAC
688	CENTS	CWA

/ /

Date Signature (in ink)

REQUEST FOR PAYROLL ALLOTMENTS FOR POLITICAL ACTION COMMITTEE-CWA

LEASE PRINT OUR

LAST NAME FIRST NAME INITIAL

I HEREBY AUTHORIZE THE C&P TELEPHONE COMPANY OF _____ TO DEDUCT FROM MY WAGES, IN ACCORDANCE WITH THE AGREEMENT BETWEEN THE COMPANY AND C.W.A. DATED JUNE ___, 1979, ALLOTMENTS WHICH ARE TO BE REMITTED TO THE CWA-COPE POLITICAL CONTRIBUTIONS COMMITTEE, SECRETARY-TREASURER, C.W.A. THIS AUTHORIZATION IS VOLUNTARILY MADE ON THE SPECIFIC UNDERSTANDING THAT THE SIGNING OF THIS AUTHORIZATION AND THE MAKING OF PAYMENTS TO CWA-COPE-PCC ARE NOT CONDITIONS OF MEMBERSHIP IN THE UNION OR OF EMPLOYMENT WITH THE COMPANY AND THAT CWA-COPE-PCC WILL USE THE MONEY IT RECEIVES TO MAKE POLITICAL CONTRIBUTIONS AND EXPENDITURES IN CONNECTION WITH FEDERAL, STATE AND LOCAL ELECTIONS. THIS AUTHORIZATION REVOKES AND SUPERSEDES ANY AUTHORIZATION PREVIOUSLY GIVEN BY ME.

COPY FOR UNION

CWA LOCAL NO | | | | | | | Form

1. ENTER SOCIAL SECURITY NUMBER HERE →

2. ENTER AMOUNT TO BE DEDUCTED MONTHLY TO CANCEL ENTER 000.00.

Monthly Amount		PAC
688	CENTS	CWA

HOME ADDRESS	STREET		APT. NO.
	CITY	STATE	ZIP CODE

/ /

Date Signature (in ink)

REQUEST FOR PAYROLL ALLOTMENTS FOR POLITICAL ACTION COMMITTEE-CWA

CCCH 1029

John W. Gray, Jr.
Assistant Vice President and Attorney

AT&T
American Telephone and
Telegraph Company
2000 L Street, N.W.
Suite 710
Washington, D. C. 20036
Phone (202) 457-3843

June 22, 1979

William C. Oldaker, Esquire
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Re: MUR 947

Dear Mr. Oldaker:

Your letter addressed to Mr. Charles L. Brown, President (now Chairman of the Board), American Telephone and Telegraph Company, dated June 7, 1979, regarding the filing of a complaint by Glenn E. Watts, President of the Communications Workers of America alleging a violation of the Federal Election Campaign Act of 1971, as amended, was received on June 12, 1979, and you requested a reply within 10 days of our receipt. Although we had hoped to provide you a response today, I advised Vincent J. Convery, Jr. that the materials we are assembling have not yet been received and, therefore, I would appreciate your granting us an extension to respond until Monday, July 2, 1979. I discussed this with Mr. Convery by telephone this morning and he indicated that this was acceptable to him.

Respectfully yours,

John W. Gray, Jr.

cc:
Mr. V. J. Convery, Jr.

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FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles L. Brown, President
American Telephone and Telegraph Company
195 Broadway
New York, New York 10007

Re: MUR 947

Dear Mr. Brown:

This is to advise you that a complaint alleging a violation of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by the American Telephone and Telegraph Company has been filed with the Commission. A copy of the complaint, which was filed by Glenn E. Watts, President of the Communications Workers of America, is attached.

After considering the information contained in the complaint, and in the attachments thereto, the Commission found reason to believe that AT&T has violated 2 U.S.C. § 441b(b)(6). That statute requires that:

> "Any corporation, including its subsidiaries, branches, divisions and affiliates, that uses a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available such method, on written request, and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions and affiliates."

The Commission's finding is based, specifically, on AT&T's failure to make available to CWA, on a company-wide basis, the payroll deduction method for the making of voluntary contributions that is utilized in several AT&T subsidiaries.

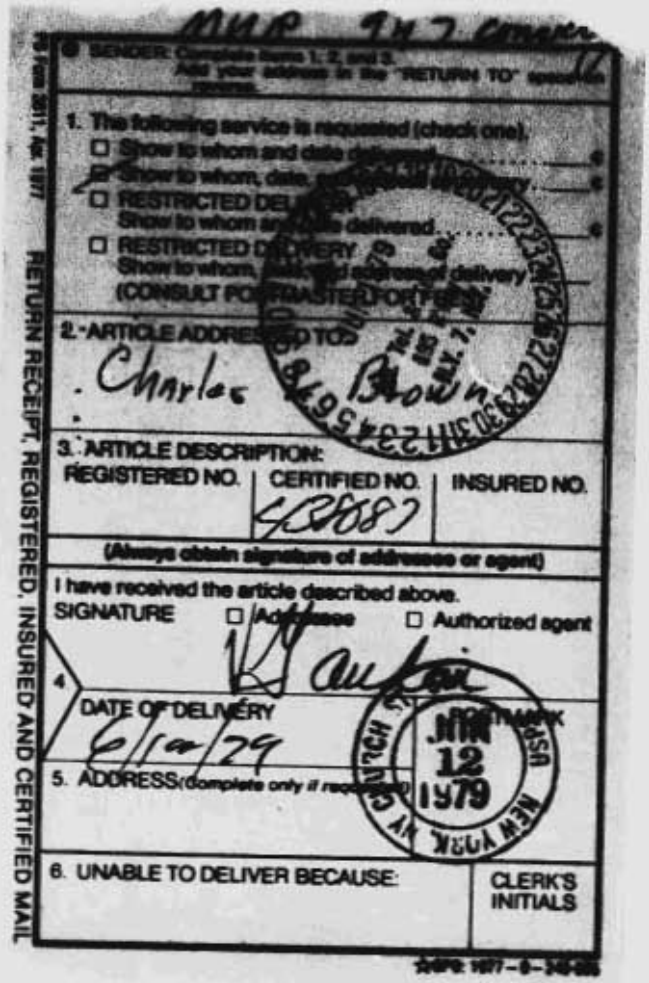
Under the Act, you have the opportunity to demonstrate that no further action should be taken by the Commission. In this regard, you should forward, within ten days of your receipt of this letter, any information you deem to be relevant to the Commission's inquiry into this matter. Where applicable, such information should be submitted in notarized form.

If you have any questions, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 947
American Telephone and Telegraph Company)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on June 5, 1979, the Commission, meeting in an executive session at which a quorum was present, took the following actions in MUR 947:

1. Failed by a vote of 2-4 to pass the following motion:

   MOVED, that the Commission reject the recommendation of the General Counsel contained in the April 17, 1979 report on MUR 947, find no reason to believe that the American Telephone and Telegraph Company violated 2 U.S.C. §441b(b)(6), and close the file in this matter.

   Commissioners Aikens and Friedersdorf voted affirmatively for the motion. Commissioners Harris, McGarry, Thomson, and Tiernan dissented.

2. Passed by a vote of 4-2 a motion to take the following actions in MUR 947 as recommended by the General Counsel:

   a. Find reason to believe that the American Telephone and Telegraph Company violated 2 U.S.C. §441b(b)(6).

   b. Authorize the sending of the letter of notification attached to the General Counsel's April 17, 1979 report.

   Commissioners Harris, McGarry, Thomson, and Tiernan voted affirmatively for the motion. Commissioners Aikens and Friedersdorf dissented.

Attest:

6/6/79
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE by pc

DATE: MAY 30, 1979

SUBJECT: MUR 947 - First General Counsel's Report dated 5-23-79; Received in Office of Commission Secretary 5-23-79, 5:18
OBJECTION

The above-named document was circulated on a 48 hour vote basis at 9:00, May 25, 1979.

Commissioner Friedersdorf submitted an objection at 11:25, May 30, 1979, thereby placing MUR 947 on the Executive Session Agenda for June 5, 1979.

May 23, 1979

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 947

Please have the attached First General Counsel's Report on MUR 947 distributed to the Commission on a 48 hour tally basis.

Thankyyou.

FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION MAY 23 1979

MUR NO. 947
DATE COMPLAINT RECIEVED
BY OGC April 17, 1979

STAFF MEMBER(S) Convery

COMPLAINANT'S NAME: Glenn E. Watts
President, Communications Workers of America

RESPONDENT'S NAME: American Telephone and Telegraph Company

RELEVANT STATUTE: 2 U.S.C. § 441b(b)(6)
11 CFR 114.5(k)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

It is alleged that the American Telephone and Telegraph Company (AT&T) violated section 441b(b)(6) of the Act (and the related Regulation, 11 CFR 114.5(k)) by refusing to make available to the Communications Workers of America (CWA), on a company wide basis, the use of the payroll deduction method for facilitating the making of voluntary contributions to CWA's separate segregated fund, CWA-COPE. 1/

2 U.S.C. § 441b((6) provides as follows:

> "Any corporation, including its subsidiaries, branches, divisions, and affiliates, that utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available such method, on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions, and affiliates."

1/ By letter dated May 3, 1979, the complainant requested the Commission to issue an advisory opinion on a related issue.

BACKGROUND

Attachment A to the complaint is a copy of a letter, dated April 17, 1978, written by the complainant, in his capacity as President of the CWA, to the President of AT&T.

By that letter, CWA requested AT&T to identify the methods of soliciting voluntary contributions or facilitating the making of voluntary contributions used by it, and its subsidiaries, branches, divisions and affiliates, and requested AT&T to make those methods available to CWA in every location where CWA represented employees of AT&T, its subsidiaries, branches, divisions and affiliates.

In responding to those requests, an AT&T Vice President, in a letter dated June 12, 1978, advised CWA of the following:

a) There was no one PAC for the Bell System. The responsibility for creating and managing a PAC rested with each individual company. As of that time, 15 PAC's had been established.

b) Although the methods differed in certain respects from company to company, all the companies used some form of payroll deduction. Personal solicitations also were made.

c) The companies which had established PACs would make available to the CWA, at cost, the methods used in that company for soliciting voluntary contributions or facilitating the making of such contributions.

DISCUSSION

The issue raised by the complainant is this: If any single subsidiary, branch, division or affiliate of a corporation uses a particular method of soliciting voluntary contributions or facilitating the making of voluntary contributions, must the corporation make that method available to a labor organization representing members employed by such corporation at any of its subsidiaries, branches, divisions, or affiliates, even if that particular subsidiary, branch, division or affiliate does not itself use the method?

The provision which now is codified as 2 U.S.C. § 441b(b)(6) was made a part of the FECA by the 1976 Amendments. As initially passed by each House, the provision did not contain the words "including its

subsidiaries, branches, divisions and affiliates. 2/ Those words were added in conference. The Conference Report and subsequent floor debate in both Houses, however, provide no indication of what the Committee intended by the addition.

The transcripts of the Conference Committee meetings are inconclusive.

At the meeting of April 13, 1976, Senator Hugh Scott proposed the following amendment:

> "Any corporation or subsidiary, branch, division, or local unit of such corporation that utilizes a method of soliciting voluntary contributions or facilitating making of voluntary contributions shall make available that method on written request and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization with regard to any members it represents working for that corporation, or that subsidiary, branch, division, department or local unit of such corporation."

Because of the state of the record, it is impossible to say with any certainty just what Senator Scott was attempting to amend, i.e., it is impossible to say whether he was attempting to amend the appropriate parts of Section 321 of the House and Senate bills (see footnote), or whether he was attempting to amend an earlier amendment to those parts. 3/ (If an earlier amendment had been proposed or if one was pending at the time of the Scott amendment, it is noted nowhere in the record.)

2/ Section 321(b)(2)(iv) of H.R. 12406 provided that "any corporation which utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available, on written request, such method to a labor organization representing any members working for such corporation."
Except that it contained, immediately following the word "requests," the additional phrase "and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby," Section 321(b)(6) of S. 3065 was substantially identical to the cited provision in the House bill.

3/ The following observation, made by Rep. Wiggins while commenting on the Scott amendment, has underscored the uncertainty:
> "If we look at...the section to be amended -- it says that any corporation or any of its far flung subsidiaries, branches, divisions or affiliates that uses a payroll deduction, a check-off, any of those divisions which uses a check-off, thereupon makes available to a labor organization representing any members of that corporation the same right, even though the check-off may exist with respect to only one division, only one subsidiary. . . .I think it does need amendment.
> Your amendment says that the check-off will apply only to that unit, and not to all of the far-flung units which may not maintain the check off."

(See transcript of Conference Committee, p. 261).

A review of the discussion which followed the introduciton of the Scott amendment leaves no doubt whatever that its sponsor intended to limit a labor organization's use of a method of facilitating the solicitation or making of contributions only to those units or divisions of a corporation which employed the method. (See transcript of Conference Committee, pp. 262-265.)

Although it is impossible to ascertain from the record whether the Conference Committee adopted or rejected the Scott amendment (see transcripts, p. 265), the language of Section 321, as reported out of conference, strongly indicates rejection. Where the Scott amendment required "Any corporation or subsidiary, branch, division or local unit that utilizes a method of soliciting or facilitating... [to make that method available] to a labor organization with regard to any members it represents working for that corporation or that subsidiary branch, division, department or local unit...." the Conference substitute required "Any corporation including its subsidiaries, branches, divisions and affiliates that utilizes a method of soliciting... or facilitating ... [to make available that method] to a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions and affiliates.

With no legislative history to guide us, we look exclusively to the language of 2 U.S.C. § 441b(b)(6) to interpret the meaning.

That language clearly includes within the term "corporation" any "subsidiary, branch, division and affiliate" of that corporation. It would follow, then, that for the purposes of this section at least, the actions of any of the listed subordinate entities are imputed to the parent corporation.

If a subordinate entity of the corporation utilizes a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, then the corporation itself is deemed to be utilizing that method, and the corporation must make the method available to a labor organization representing any members working for the corporation [to include] its subsidiaries, branches, divisions and affiliates.

CONCLUSION

Since certain subsidiaries of the American Telephone and Telegraph Company utilized the payroll deduction method for facilitating the making of voluntary contributions, AT&T must make that method available, at cost, to the labor organization representing members working for the corporation, its subsidiaries, branches, divisions and affiliates.

The American Telephone and Telegraph Company, by its June 12, 1978, letter to the President of the Communications Workers of America, failed to do so.

RECOMMENDATION:

1. Find reason to believe that the American Telephone and Telegraph Company violated 2 U.S.C. § 441b(b)(6).

2. Authorize the sending of the attached letter of notification.

Attachments:
1. Complaint, with 3 enclosures
2. Proposed letter of notification

3 1 0 1 0 2 3 5 5 1 7

MUR 947 GCC 9882

Communications

GLENN E. WATTS, President

CWA

Workers of America

(AFFILIATED WITH AFL-CIO)
1925 K STREET, N.W.
WASHINGTON, D. C. 20006
TELEPHONE: AC 202/785-6710

RECEIVED
FEDERAL ELECTION
COMMISSION

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April 9, 1979

902028

File: 6.
x1.34

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: Complaint Charging the American Telephone & Telegraph Company With A Violation of 2 U.S.C. § 441b (b)(6)

Dear Chairman Aikens:

In my capacity as President of the Communications Workers of America ("CWA" or the "Union"), I hereby file this complaint charging the American Telephone & Telegraph Company, including its subsidiaries, branches, divisions and affiliates ("AT&T" or the "Company") with the following continuing violation of 2 U.S.C. § 441b(b)(6) and of § 114.5(k) of the Commission's Regulations:

Certain of AT&T's subsidiaries (listed in Attachment C hereto) have established "PAC's [Political Action Committees] which generally involve third and higher levels of management" (Attachment B hereto) and which use "some form of payroll deduction" (id.) but AT&T has denied CWA's request "that AT&T *** make available to the CWA the methods used by it at every location where [the Union] represent[s] employees to solicit voluntary contributions to its political action committee" (id.) and has instead offered only to make the payroll deduction available to CWA at the subsidiaries that use that method of facilitating the making of a contribution to a PAC.

Attachment 1

AT&T's refusal to make available to CWA on a company-wide basis the use of the payroll deduction method of facilitating the making of voluntary contributions to CWA-COPE is in plain contravention of the Company's obligation under § 441b(b)(6) as expressly elaborated in § 114.5(k)(1) of the Commission's Regulations which states:

> (1) If a corporation, including its subsidiaries, branches, divisions, or affiliates, utilizes a payroll deduction plan, checkoff system, or other plan which deducts contributions from the dividend or payroll checks of stockholders or executive or administrative personnel, the corporation shall, upon written request of the labor organization, make that method available to members of the labor organization working for the corporation, its subsidiaries, branches, divisions, or affiliates, who wish to contribute to the separate segregated fund of the labor organization representing any members working for the corporation, or any of its subsidiaries, branches, divisions, or affiliates. The corporation shall make the payroll deduction plan available to the labor organization at a cost sufficient only to reimburse the corporation for the actual expenses incurred thereby.

I hereby request that the Federal Election Commission take such actions as are necessary and proper to enforce AT&T's compliance with the aforementioned sections of the U. S. Code and the FEC Regulations.

This complaint is filed on behalf of CWA and not on behalf of or at the request or suggestion of any candidate.

Very truly yours,

Glenn E. Watts

Glenn E. Watts
President

Attachments

Subscribed and signed to before me this 11th day of April, 1979 in Washington, D. C.

Marlyn R. Smith
Notary Public
My Commission Expires April 30, 1983

File

April 17, 1978

File: 6
XI.34

Mr. Charles L. Brown, President
American Telephone & Telegraph Company
195 Broadway
New York, New York 10007

Dear Mr. Brown:

The Communications Workers of America represents members working for your corporation, its subsidiaries, branches, divisions and affiliates. The Federal Election Campaign Act Amendments of 1976, Part 114, Section 114.5(k) of the FEC Rules and Regulations, provides that:

> "Any corporation, including its subsidiaries, branches, divisions, and affiliates, that uses a method of soliciting voluntary contributions or facilitating the making of voluntary contributions from its stockholders or executive or administrative personnel and their families, shall make that method available to a labor organization representing any members working for the corporation, its subsidiaries, branches, divisions, and affiliates for soliciting voluntary contributions or facilitating the making of voluntary contributions from its members and their families. Such method shall be made available on the written request of the labor organization and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby."

The purpose of this letter is to make the written request which will oblige you to make available to the Communications Workers of America in every location where we represent employees of the American Telephone & Telegraph Company, its subsidiaries, branches, divisions and affiliates, the methods of soliciting voluntary contributions or facilitating the making of voluntary contributions utilized by the American Telephone & Telegraph Company (the parent corporation) to its political action committees.

Attachment A to Complaint

ENTERED

More specifically, we hereby request that you state to us the methods of soliciting voluntary contributions or facilitating the making of voluntary contributions presently used by the American Telephone & Telegraph Company, its subsidiaries, branches, divisions and affiliates so that we can determine which of these we will also use.

To minimize unnecessary paperwork, this request is intended to be of a continuing nature. Thus, if the American Telephone & Telegraph Company, its subsidiaries, branches, divisions and affiliates determine in the future to utilize a method or methods not presently being used of soliciting voluntary contributions or facilitating the making of voluntary contributions, we would expect to be promptly advised of that action so that we can determine whether to take advantage of any correlative rights.

Sincerely,

Glenn E. Watts
President

(A)

Rex R. Reed
Vice President

AT&T
American Telephone and
Telegraph Company
295 North Maple Avenue
Basking Ridge, N.J. 07920
Phone (201) 221-5400

June 12, 1978

6
x 1.34

Mr. Glenn E. Watts, President
Communications Workers of America
1925 'K' Street, NW
Washington, DC 20006

Dear Glenn:

This is in response to your letter of April 17 addressed to Mr. Brown which requests that AT&T specify and make available to the CWA the methods used by it at every location where you represent employees to solicit voluntary contributions to its political action committee (PAC).

You should be aware that there is no one PAC for the Bell System. The responsibility for creating and managing a PAC rests with each individual company. At present, 15 PAC's which generally involve third and higher levels of management have been established. A list of these PAC's is enclosed.

The methods for solicitation and collection of voluntary contributions to the PAC's differ in some respects from company to company. Also, some companies have Federal - State combined PAC's and others have separate State and Federal PAC's. However, in all cases some form of payroll deduction is used and personal solicitations are made.

The companies with PAC's will make available to the CWA, at cost, the methods used in that company for soliciting voluntary contributions or facilitating the making of such contributions. As with other types of union solicitation, personal solicitation to union PAC's would be limited to non-working time in non-working areas of the company.

Because of the difference in the various PAC's, we suggest that your local people deal directly with each company. If additional PAC's are created in the future, the respective companies involved will inform your local representatives.

Sincerely,

Attachment

RECEIVED
JUN 15 1978
PRESIDENT

Attachment B to Complaint

BELL SYSTEM PAC's

Company Name	Address
American Telephone Political Action Committee	195 Broadway New York, New York 10007
Ohio Bell Federal Political Action Committee	100 Erieview Plaza, Rm. 1400 Cleveland, Ohio 44114
Indiana Bell Political Action Committee	240 N. Meridian Street Indianapolis, Indiana 46204
Pacific Northwest Bell Employee Public Interest Committee	1600 Bell Plaza, Rm. 3105 Seattle, Washington 98191
Western Electric Political Action Committee	222 Broadway New York, New York 10038
Michigan Bell Political Action Committee	444 Michigan Avenue Detroit, Michigan 48226
Pacific Telephone Federal Political Action Committee	140 New Montgomery Street San Francisco, California 94105
Bell of Pennsylvania Political Action Committee	One Parkway Philadelphia, Pennsylvania 19102
Diamond State Telephone Company Political Action Committee	One Parkway Philadelphia, Pennsylvania 19102
Cincinnati Bell Federal Political Action Committee	225 East Fourth Street Cincinnati, Ohio 45202
Mountain Bell Employee Active Citizenship Program	931 Fourteenth Street Denver, Colorado 80202
Wisconsin Telephone Company Federal Political Action Committee WIS-FEDPAC	722 North Broadway Milwaukee, Wisconsin 53202
C&P Federal Political Action Committee	1710 'H' Street, NW Washington, DC 20006
New England Telephone Federal Political Action Committee	185 Franklin Street Boston, Massachusetts 02107
South Central Bell Federal Political Action Committee	600 North 19th Street Birmingham, Alabama 35203

Attachment C to Complaint

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles L. Brown, President
American Telephone and Telegraph Company
195 Broadway
New York, New York 10007

Re: MUR 947

Dear Mr. Brown:

This is to advise you that a complaint alleging a violation of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by the American Telephone and Telegraph Company has been filed with the Commission. A copy of the complaint, which was filed by Glenn E. Watts, President of the Communications Workers of America, is attached.

After considering the information contained in the complaint, and in the attachments thereto, the Commission found reason to believe that AT&T has violated 2 U.S.C. § 441b(b)(6). That statute requires that:

> "Any corporation, including its subsidiaries, branches, divisions and affiliates, that uses a method of soliciting voluntary contributions or facilitating the making of voluntary contributions, shall make available such method, on written request, and at a cost sufficient only to reimburse the corporation for the expenses incurred thereby, to a labor organization representing any members working for such corporation, its subsidiaries, branches, divisions and affiliates."

The Commission's finding is based, specifically, on AT&T's failure to make available to CWA, on a company-wide basis, the payroll deduction method for the making of voluntary contributions that is utilized in several AT&T subsidiaries.

Attachment 2

Under the Act, you have the opportunity to demonstrate that no further action should be taken by the Commission. In this regard, you should forward, within ten days of your receipt of this letter, any information you deem to be relevant to the Commission's inquiry into this matter. Where applicable, such information should be submitted in notarized form.

If you have any questions, please contact Vincent J. Convery, Jr., the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

April 17, 1979

Mr. Glenn E. Watts
President
Communications Workers of America
1925 K Street, N.W.
Washington, D.C. 20006

Dear Mr. Watts:

This is to acknowledge receipt of your complaint of April 9, 1979, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely,

Hal Ponder
Assistant General Counsel

Enclosure

MUR 947
GCC 9882

RECEIVED
FEDERAL ELECTION
COMMISSION

Communications

GLENN E. WATTS, President

CWA

Workers of America

(AFFILIATED WITH AFL-CIO)
1925 K STREET, N.W.
WASHINGTON, D. C. 20006
TELEPHONE: AC 202/785-6710

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April 9, 1979

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File: 6.
x1.34

The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

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I hereby request that the Federal Election Commission take such actions as are necessary and proper to enforce AT&T's compliance with the aforementioned sections of the U. S. Code and the FEC Regulations.

This complaint is filed on behalf of CWA and not on behalf of or at the request or suggestion of any candidate.

Very truly yours,

Glenn E. Watts

Glenn E. Watts
President

Attachments

Subscribed and signed to before me this 11th day of April, 1979 in Washington, D. C.

Marlyn R. Smith

Notary Public

File

April 17, 1978

File: 6
21.34

Mr. Charles L. Brown, President
American Telephone & Telegraph Company
195 Broadway
New York, New York 10007

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Sincerely,

Glenn E. Watts
President

ab/cp

Rex R. Reed
Vice President

AT&T
American Telephone and
Telegraph Company
295 North Maple Avenue
Basking Ridge, N.J. 07920
Phone (201) 221-5400

June 12, 1978

Mr. Glenn E. Watts, President
Communications Workers of America
1925 'K' Street, NW
Washington, DC 20006

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Sincerely,

Attachment

RECEIVED
JUN 15 1978
PRESIDENT

GLENN E. WATTS
President

COMMUNICATIONS WORKERS
OF AMERICA
(AFFILIATED WITH AFL-CIO)

1925 K STREET, N.W.
WASHINGTON, D. C. 20006

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FEDERAL ELECTION COMMISSION

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The Honorable Joan D. Aikens, Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 947

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