

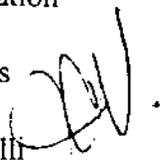


FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 24, 2002

MEMORANDUM

TO: The Commission
General Counsel
Staff Director
Public Information
Press Office
Public Records

FROM: John C. Vergelli 
Acting Assistant General Counsel

SUBJECT: Comments on Notice of Proposed Rulemaking Coordinated and
Independent Expenditures

Attached is an additional submission for the record offered by Professor Robin Kolodny during her testimony before the Commission on Wednesday, October 23, 2002. This submission pertains to the above Notice of Proposed Rulemaking, Notice 2002-16, published in the September 24, 2002 Federal Register (67 *Fed. Register* 60042). The comment period ended on October 11, 2002.

Attachments

cc: Deputy General Counsel
Acting Associate General Counsel
Congressional Affairs Officer
Executive Assistants

From: Robin Kolodny and David A. Dulio, "Political Party Adaptation in US Congressional Campaigns: Why Political Parties Use Coordinated Expenditures to Hire Political Consultants," forthcoming *Party Politics*."

Table 1. Coordinated Expenditures by Party and Chamber, 1998 and 2000

	Sum Total of Party Coordinated Expenditures		Total Democratic Expenditures (House and Senate combined)		Total Republican Expenditures (House and Senate combined)		Total House Expenditures (Democrat and Republican combined)		Total Senate Expenditures (Democrat and Republican combined)	
	1998	2000	1998	2000	1998	2000	1998	2000	1998	2000
Total Dollars	\$29,916,555	\$23,321,029	\$14,876,860	\$7,200,810	\$15,039,695	\$16,120,219	\$9,498,781	\$7,395,298	\$20,417,774	\$15,925,730
Amount Spent on Political Consultants	90.1%	93.7%	88.7%	89.1%	91.5%	95.8%	77.4%	92.3%	96.0%	94.4%
Amount Spent for Party Provided Campaign Activities	3.5%	1.5%	7.1%	4.7%	0%	0%	11.2%	4.6%	0%	0%
Amount Spent on All Other Outlays	6.3%	4.8%	4.1%	6.2%	8.5%	4.2%	11.4%	3.1%	4.0%	5.6%

Note: Some columns may not add to 100% due to rounding.

Table 2. Coordinated Expenditures by Purpose and Consultant Use, 1998 and 2000

Campaign Activity	Total Coordinated Dollars Spent		Total Dollars Paid to Consultants		Percent of Total Dollars Going to Consultants	
	1998	2000	1998	2000	1998	2000
Total Dollars	\$29,916,555	\$23,321,029	\$26,958,051	\$21,857,803	90.3%	93.7%
All Advertising	72.7%	69.4%	75.8%	72.8%	68.3%	68.3%
Campaign Activity	23.2%	22.5%	20.9%	22.3%	18.8%	20.9%
Polling	3.0%	3.9%	3.3%	4.2%	3.0%	3.9%
Overhead	1.0%	2.4%	0.0002%	0%	0.1%	0.0%
Fundraising	0.1%	1.7%	0.0001%	0.6%	0.1%	0.6%

Note: Some columns may not add to 100% due to rounding.

Table 3. Timing of Coordinated Expenditures, 1998 and 2000.

Year	Percentage of Coordinated Expenditures Made Before:			
	August 1	September 1	October 1	November 1
1998	16.4%	22.2%	36.8%	80.7%
2000	12.2%	19.1%	41.5%	86.7%

Table 4. Coordinated Expenditures for U.S. House and Senate Campaigns by Purpose and Vendor Type, 1998 and 2000

	All Advertising		Campaign Activity (Research, Direct Mail, Telemarketing)		Polling		Overhead (including rents, travel, and salaries)		Fundraising Expenses (including all overhead for fundraising)	
	1998	2000	1998	2000	1998	2000	1998	2000	1998	2000
Total Dollars	\$21,740,846	\$16,193,527	\$6,943,074	\$5,239,856	\$900,679	\$915,128	\$248,637	\$559,417	\$83,319	\$393,101
Amount Spent on Consultants	93.9%	98.3%	80.9%	92.9%	100%	100%	2.1%	0%	4.8%	34.4%
Amount Spent for Party Provided Activities	3.7% ¹	1.7% ²	3.1% ³	0.5% ⁴	0%	0%	0%	0%	60.4% ⁵	11.7% ⁶
Amount Spent on all other Vendors	2.4%	0.01%	15.9%	6.6%	0%	0%	97.9%	100%	34.9%	53.9%

Note: Some columns may not add to 100% due to rounding.

¹ This number is entirely for DCCC in-house media services (mostly the use of their in-house production facility). Thus it applies only for Democrats in the House of Representatives.
² This number is entirely for DCCC in-house media services (mostly the use of their in-house production facility). Thus it applies only for Democrats in the House of Representatives.
³ This number is entirely for DCCC in-house research services. As above, this number applies only to Democrats in the House of Representatives.
⁴ This number is entirely for DCCC in-house research services. As above, this number applies only to Democrats in the House of Representatives.
⁵ This number is entirely for DCCC in-house fundraising services. It applies as in the two previous notes.
⁶ This number is entirely for DCCC in-house fundraising services. It applies as in the two previous notes.