



Thomas Hoffman <ThomasH@acr.org> on 11/19/2003 02:08:25 PM

To: "payrollded03@fec.gov" <payrollded03@fec.gov>

cc:

Subject: FEC Notice 2003-18

November 19, 2003

Mr. John C. Vergelli
Acting Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: FEC Notice 2003-18: Petition from America's Community Bankers

Dear Mr. Vergelli:

The American College of Radiology Association (ACRA) writes to express support for the Petition filed with the Commission on August 29, 2003 by America's Community Bankers. The ACRA is a nonprofit, tax-exempt 501(c)(6) organization that serves as the principal professional association for over 30,000 diagnostic radiologists, radiation oncologists and medical physicists. ACRA has a connected Political Action Committee.

For the reasons stated in the Petition, ACRA supports amending section 114.8(e)(3) of the Commission's regulations to allow a trade association to use payroll deduction vehicles to facilitate voluntary contributions to its separate segregated fund from its corporate members' restricted classes. Additionally, ACRA requests that the Commission also include in its review allowing individual members of a professional society to use payroll deductions to contribute to the society's PAC through their medical group practices or professional corporations. The legal and policy rationale for amending the regulations to benefit trade associations extends with equal force to professional societies. Numerous members of ACRA and other professional societies have expressed interest in voluntarily contributing to their societies' PACs through their businesses. Payroll deduction plans would efficiently accomplish that legitimate objective and provide an ongoing mechanism to comply with Commission recordkeeping and reporting requirements.

Therefore, the ACRA urges the Commission to grant the Petition and include in a proposed rulemaking applying the amended regulation both to trade associations and professional societies. Thank you for your consideration.

Sincerely,

Thomas R. Hoffman
Associate General Counsel
American College of Radiology

1891 Preston White Drive
Reston, VA 20191-4397
(800) 227-5463, x4951
(703) 620-6329 (fax)
thomash@acr.org