



"Englert, Alexis" <Alexis\_englert@afandpa.org> on 11/25/2003 02:40:59 PM

To: "payrollded03@fec.gov" <payrollded03@fec.gov>  
cc: "Debbie Kipps (dbkipps@juno.com)" <dbkipps@juno.com>, "Harman, Donna" <Donna\_Harman@afandpa.org>, "Kirshner, Robert" <Robert\_Kirshner@afandpa.org>, "Moffett, Katy" <Katy\_Moffett@afandpa.org>

Subject: AF&PA Comments

Please find the American Forest & Paper Association's attached comments regarding the "Rulemaking Petition: Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund, Notice 2003-18, dated October 24, 2003."

Please call or email with any questions, or if you would prefer a different format.

Thank you,  
Alexis Englert  
Coordinator, Congressional Affairs  
American Forest & Paper Association  
1111 19th Street, NW, Suite 800  
Washington, DC 20036  
Tele: 202/463-2739  
Fax: 202/463-2424

Please find the American Forest & Paper Association's attached comments regarding the "**Rulemaking Petition: Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund, Notice 2003-18, dated October 24, 2003.**"

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By E-Mail: [payrollded03@fec.gov](mailto:payrollded03@fec.gov)

November 25, 2003

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

Re: Rulemaking Petition: Payroll Deduction Contributions to a Trade  
Association's Separate Segregated Fund, Notice 2003-18, dated October  
24, 2003

Dear Mr. Vergelli:

The American Forest & Paper Association (AF&PA) supports changes to allow qualified employees of member companies to make voluntary contributions to the national trade association representing an industry.

AF&PA is a non-profit trade association representing the forest products industry. AF&PA has more than 120 member companies that grow, harvest, and process wood and wood fiber and manufacture a wide variety of products including pulp, paper, paperboard and wood products. AF&PA's member companies produce more than 92% of the nation's pulp, 78% of the nation's paper, 89% of the nation's paperboard, 60% of the nation's dimensional lumber, and 85% of the nation's wood panel products. AF&PA members represent about 80% of the industrial forestland in the United States. The forest products industry accounts for almost 7% of the total U.S. manufacturing output, employs 1.5 million people and ranks among the top 10 manufacturing employers in 42 states.

AF&PA maintains a separate segregated fund, American Forest & Paper Association Political Action Committee (AF&PA PAC). We support a rule that would allow qualified employees of member companies to make voluntary contributions to AF&PA PAC through a payroll deduction service. We would like to offer our members' employees the convenience of being able to contribute to AF&PA PAC via payroll deduction.

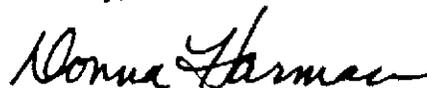
Mr. John C. Vergelli  
November 25, 2003  
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We believe that the petition of America's Community Bankers (ACB) urging the FEC to revise 11 CFR 114.8(e)(3) makes sense as more and more Americans receive and transmit funds electronically. Furthermore, ACB's petition represents a permissible interpretation of the Federal Campaign Act ("FECA"), specifically, 2 U.S.C. Sec. 441(b).

The FEC has long held that a trade association may accept donations of money, goods and services to support the administration of the association's separate segregated fund.

AF&PA appreciates the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Donna Harman". The signature is written in a cursive, flowing style.

Donna A. Harman  
Vice President, Congressional Affairs  
donna\_harman@afandpa.org