



Greg Badovinac <ned@ccul.org> on 11/24/2003 05:44:40 PM

To: payrollded03@fec.gov
cc:

Subject: Rulemaking Petition: Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund

Please accept this comment letter from the California and Nevada Credit Union Leagues on the pending petition on payroll deductions to trade association PACs.

If you have any questions, please feel free to contact me.

Greg Badovinac
Federal Regulatory Analyst
California Credit Union League
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- FEC - Payroll Deduction - Nov 2003.doc



November 24, 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

Dear Mr. Vergelli:

On behalf of the 600 credit unions in California and Nevada, the California and Nevada Credit Union Leagues (the League) support the rulemaking petition that would allow the use of member corporations of payroll deduction for contributions to a trade association's separate segregated fund.

The League has a federal separate segregated fund (California Credit Union League PAC) that collects contributions from credit union officials, employees and members to contribute to candidates for federal offices. We would welcome the opportunity to provide a payroll deduction option to persons within our restricted classes so that they can make contributions through smaller, regular deductions every payday.

In addition, the use of payroll deduction to contribute funds to our federal PAC will not only reduce our costs of generating funds, but also make for easier documentation of contributing individuals required for regular reporting. Nothing in election law appears to prohibit the use of payroll deduction in this matter pursuant to ensuring proper reporting of contributions.

Should you have any questions, please feel free to contact our Director of Political Finance, Ron Fong, at 800.472.1702 extension 1364.

Sincerely,

David L. Chatfield
President/CEO

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