



HOME BUILDERS ASSOCIATION OF GREATER CINCINNATI

Please deliver the following pages to:

Name: Brad Deutsch

Company: _____

Fax Number: 202 219 3923

We are transmitting (2) pages (including this cover letter).

Name: Michael

Phone: (513) 851-6300 Fax: (513) 589-3211

Date: 1/20/05

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2005 JAN 21 A 8:51

- Per your request
- For your information
- With reference to our telephone conversation
- Please call upon receipt
- Please handle the following

NOTES: _____

HBA REMINDERS FOR JANUARY

January 13 - 16
January 31

NAHB Convention - Orlando
Build-PAC Membership Drive Ends

To make reservations, call Tara at 513.851.6300,
Email her at tlarabee@cincybuilders.com, or
Register online at www.cincybuilders.com

415 Glensprings Drive, Cincinnati, Ohio 45246-2357
www.cincybuilders.com



HOME BUILDERS ASSOCIATION OF GREATER CINCINNATI

January 20, 2005

Mr. Brad C. Deutsch
Asst. General Counsel
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2005 JAN 21 A 8:57

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

Dear Mr. Deutsch:

The Home Builders Association of Greater Cincinnati appreciates the opportunity to offer comments in support of the American Community Bankers' (ACB) Petition for Rulemaking urging the Federal Election Commission (FEC) to revise the rule prohibiting the use by member corporations of payroll deductions to a trade association's political action committee (PAC).

The Home Builders Association of Greater Cincinnati is comprised of over 1,300 Member companies. Our Member companies employ an estimated 26,000 people in the Greater Cincinnati area. Many employees of our Member companies may find it more convenient to make regular contributions via a payroll deduction. Since payroll deductions for political contributions are already legal for members of labor unions and employees of corporations with their own PACs, it is also fair that employees of Member companies be allowed to contribute to a trade association's PAC in the same manner. This practice is already legal in Ohio for state PACs. Therefore, allowing it on the Federal level seems to be a reasonable request.

The Home Builders Association of Greater Cincinnati urges the FEC to act favorably on ACB's petition.

If you have any questions, or if I can be of further assistance, please feel free to contact me at (513) 851-6300.

Sincerely,

Michael Harlow
Assistant Director of Governmental Affairs