



January 21, 2005

Mr. Brad C. Deutsch
Assistant General Counsel
Federal Election Commission
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Washington, DC 20463

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Re: Notice of Proposed Rulemaking dated December 22, 2004

Dear Mr. Deutsch:

I am writing on behalf of the American Hospital Association ("AHA") in response to the request for comments on the Notice of Proposed Rulemaking ("NPRM") on Payroll Deductions by Member Corporations for Contributions to a Trade Association's Separate Segregated Fund published by the Federal Election Commission ("FEC" or "the Commission") on December 22, 2004.

For the reasons set forth in its comments on the earlier Petition for Rulemaking filed by the American Community Bankers, AHA strongly urges the adoption of the proposed rule published by the Commission. This rule would allow members of trade associations, such as AHA, to use payroll deduction for voluntary contributions to the trade association's separate segregated fund. This is the right result.

As the Commission notes in its discussion of the proposed rules, there are legal, policy and practical arguments which support adoption of the rule. These arguments set out clearly the reasons that adoption of such a rule is necessary to correct an inequitable situation that has existed for many years. It does not appear that there was any dissent to the new rule.

AHA appreciates the Commission's consideration of these comments. Once again, AHA strongly recommends that the Commission adopt the proposed regulations. Should you have any questions or need additional information, please do not hesitate to contact the undersigned.

Very truly yours,

Judith L. Corley
Counsel to American Hospital Association
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cc: Mark Seklecki, AHA