



**NATIONAL
FISHERIES
INSTITUTE**

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Mr. Brad Deutsch
Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Deutsch,

The following constitutes official comments of the National Fisheries Institute (NFI) regarding the proposed amendments to current FEC rules with respect to contributions to the separate segregated fund of a trade association by employee-stockholders and executive and administrative personnel of corporations that are members of the trade association. By way of background, NFI is the nation's leading trade association for the diverse commercial fish and seafood industry. We are a "water to table" organization, representing fishing vessel owners, aquaculture operations, processors, importers, exporters, distributors, restaurants, and retail establishments. NFI's mission on behalf of its more than 500 members is to ensure an ample, safe, and sustainable seafood supply to consumers.

As you are well aware, currently the Commission's regulations prohibit any corporate member of a trade association from using a payroll deduction or check-off system for employee contributions to a trade association political action committee. However, an organization such as a labor union, which is structured in a manner not significantly different from a trade association, is permitted to use such a deduction for employee contributions to their political action committee. The result is that trade associations are at a competitive disadvantage in terms of financially supporting, and ultimately electing candidates that are strong supporters of their

respective interests. We are therefore greatly heartened to learn that the Commission proposes to amend its regulations to permit trade associations the use of these fundraising methods. The NFI strongly supports such amendments. We seek a level playing field from which to advocate our goals on behalf of our membership.

We look forward to a Notice of Final Rulemaking on this matter in the near term and are grateful to the Commission for the opportunity to provide comments on this very important issue.

Sincerely,

John Connelly
President