



January 21, 2005

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

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2005 JAN 24 1P 1:57

Re: Payroll Deductions by Member Corporations for Contributions to a Trade Association's Separate Segregated Fund

Dear Mr. Deutsch:

On behalf of the 600 credit unions serving more than 10 million members in California and Nevada, the California and Nevada Credit Union Leagues (the League) strongly support the Commission's proposed regulatory proposal that would allow credit union employees of our member credit unions to voluntarily permit them to contribute to the League's separate segregated fund (SSF) (California Credit Union League PAC). We supported the 2003 "Petition for Rulemaking" as proposed.

As currently permitted, the League's SSF obtains solicitation (permission) agreements from our member credit unions that allow these credit union employees (and credit union members) to contribute to the SSF. While this has been successful, it does require the use of additional resources to encourage and collect SSF contributions.

Allowing the employees of our member credit unions to voluntarily elect to have their SSF contributions be electronically transmitted to the League's SSF would foster additional participation by more citizens into the political process. In addition, the amount of funds available to our SSF would increase.

We additionally acknowledge and support the decision whether or not to participate in this process should be made by the executives of our member credit unions. That decision would take into account the ability of other SSFs to solicit their employees with the same opportunity to accept SSF contributions by payroll deduction along with that of the employee union's SSS, if applicable.

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California Credit Union League • *Serving Credit Unions in California and Nevada*

We look forward to quick action by the Commission to adopt these regulations as beneficial to all involved parties.

If you have any questions, please feel free to contact the League's Government Affairs Analyst, Greg Badovinac, at 800.472.1702 ext. 3229 or ned@ccul.org.

Sincerely,

David L. Chatfield  
President/CEO

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