



The KANSAS BANKERS ASSOCIATION
A Full Service Banking Association

January 24, 2005

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

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COUNSEL
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Federal Election Commission; Notice of Proposed Rulemaking: 11 CFR Part 114; Payroll Deductions by Member Corporations for Contributions to a Trade Association's Separate Segregated Fund ; 69 Federal Register 76628, December 22, 2004

Dear Mr. Deutsch:

The Kansas Bankers Association (KBA) appreciates the opportunity to comment in support of the Federal Election Commission's (FEC) proposed amendments to its rules regarding contributions to the separate segregated fund (SSF) of a trade association by employee-stockholders and executive and administrative personnel of corporations that are members of trade associations." KBA's membership includes 363 state and federally chartered banks, which provide a wide array of financial services, and employ an estimated 14,000 individuals in Kansas.

KBA commends the FEC for issuing the proposed rulemaking and urges its quick adoption and implementation. KBA supports the ability of individuals to participate in the political process and believes the regulatory prohibition against payroll deduction and check-off systems is an unnecessary restraint on that participation. Payroll deduction is a common method widely used to make payments of many types. Contributions for charitable, savings, and other purposes are often made through payroll deductions and the mechanisms for record keeping and automation are well tested and seasoned. It is our understanding that the FEC has historically permitted employee contributions to SSFs sponsored by corporations and labor organizations. In light of this fact, there appears to be no legal or logical reason for continuing the prohibition on payroll deductions from one segment of the populace while permitting it for another.

Thank you for this opportunity to share our views. If you have any questions or need additional information regarding this letter, please do not hesitate to contact me at (785) 232-3444 or at dwarehouse@ksbankers.com.

Sincerely,

Douglas E. Wareham
Vice President-Government Affairs