



Ian Macoy <imacoy@nacha.org> on 11/14/2003 03:45:51 PM

To: Acting Assistant General Counsel John Vergelli <payrollded03@fec.gov>
cc:

Subject: Rulemaking Petition: Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund
[Notice 2003-18]

Ian Macoy
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November 14, 2003

Acting Assistant General Counsel John Vergelli
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Dear Acting Assistant General Counsel Vergelli:

To: Federal Election Commission

We are writing in support of the above-referenced rulemaking petition filed by America's Community Bankers. We encourage the Commission to amend its regulations to permit the use of payroll deduction as a means of facilitating voluntary contributions to a trade association's separate segregated fund.

As detailed in ACB's petition, this action is supported because:

The petition represents a clearly permissible interpretation because nothing in the language of the FECA or its legislative history requires exclusion of payroll deduction as a permissible method of obtaining contributions. In addition, the current prohibition is inconsistent with the FECA and other FEC regulations governing the facilitation of voluntary contributions.

Strong factual and policy considerations support this action:

The use of the electronic methods for making and receiving payments has grown tremendously since the prohibition took effect. The use of paper checks has been in steady decline since 1995 and the Federal Reserve predicts that that trend will continue, as consumers demand more convenient and quicker ways to pay for goods and services.

Payroll deduction is a common method employed by millions of Americans for a variety of regular payments.

Recent revisions to the nation's campaign finance laws have made it harder for individuals to participate in the electoral process.

Payroll deduction allows more individuals to make voluntary contributions

and to be able to do so more easily.

Sincerely,

Ian Macoy
Senior Director
NACHA--The Electronic Payments Association