



Suzanne Coker <scoker@ncha.org> on 11/24/2003 05:30:16 PM

To: payrollded03@fec.gov
cc: Bill Pully <wpully@ncha.org>, "Schor, Lori" <lschor@aha.org>

Subject: Comment Letter from NCHA

Attached please find the North Carolina Hospital Association's comment letter in support of the America's Community Bankers petition filed September 3, 2003. The attachment is in Adobe Acrobat format. If there are any problems with the attachment, please reply to this message or call me at 919/677-4231.

Thank you.
Suzanne Coker



- NCHA_Comment_Ltr.pdf

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North Carolina Hospital Association

November 24, 2003

via Electronic Mail Delivery

Mr. John C. Vergelli
Acting Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Vergelli:

The North Carolina Hospital Association ("NCHA"), representing 133 North Carolina hospitals, and the NCHA Political Action Committee ("HOSPAC") submits the following comments in support of the Petition for Rulemaking from America's Community Bankers ("ACB") urging the Commission to revise the rule prohibiting the use of payroll deductions by member corporations for contributions to a trade association's separate segregated fund ("SSF").

We agree with ACB that nothing in the Federal Election Campaign Act specifically limits this particular method of facilitating a contribution to a trade association's SSF. Further, the regulations' inclusion of the language contained in 11 CFR §114.8(e)(3) that "[t]here is no limitation on the method of soliciting voluntary contributions or the method of facilitating the making of voluntary contributions which a trade association may use" appears to directly contradict the immediately following limitation on the use of payroll deduction.

We also agree that the cost for using a payroll deduction system should not prohibit a corporate member from using that method of facilitating voluntary contributions to the trade association's SSF. Given today's widespread use of electronic transfer of funds, those costs would be minimal and in accordance with the Federal Election Commission's allowance of corporate contributions to trade association's administrative account.

The concerns that brought about the restriction on payroll deduction, as noted by ACB in the transcripts from the June 29, 1976 FEC meeting, are not entirely clear, but no longer seem valid almost 30 years later. We respectfully request that the Commission grant the ACB petition and reconsider this restriction.

Sincerely,

/s/
Suzanne L. Coker
Director of Advocacy Programs
Treasurer, HOSPAC

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