



National Marine Manufacturers Association
 1819 L Street N.W., Suite 700
 Washington, D.C. 20036
 202-721-1600 Fax 202-861-1181 www.nmma.org

November 12, 2003

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

FEDERAL ELECTION COMMISSION
 OFFICE OF GENERAL COUNSEL

2003 NOV 17 P 2:45

RE: [Notice 2003 – 18] Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund.

Dear Mr. Vergelli:

The National Marine Manufacturers Association (NMMA), the leading national recreational marine trade association representing over 1,500 member companies that are involved in every aspect of the recreational boating industry, offers the following comments on the *Rulemaking Petition: Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund*.

NMMA endorses the comments submitted by America's Community Bankers (ACB) in its petition for a rulemaking to modify the Federal Election Campaign Act (FECA). NMMA enthusiastically supports the use of payroll deductions for contributions to a trade association's separate segregated fund by a member corporation's executive and administrative personnel.

Specifically, NMMA urges the FEC to amend 11 CFR 114.8(e)(3) to allow trade associations to use payroll deductions as a means of encouraging voluntary contributions to the trade association's separate segregated fund (SSF) from its corporate members' restricted classes. As detailed by 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. See Advisory Opinion 2003-22.

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Together, making boating the #1 choice in recreation.

- The following strong factual and policy considerations provide additional reasons for supporting 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. *See* Remarks by Chairman Alan Greenspan, Federal Reserve Payments System Development Committee 2003 Conference, Washington, D.C. October 29, 2003.
 - 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 participate in the electoral process by making voluntary contributions with more ease.

NMMA is hopeful that the FEC will soon amend the regulations to allow trade associations to use payroll deductions as a means of encouraging voluntary contributions to the trade association's separate segregated fund (SSF) from its corporate members' restricted classes. Please do not hesitate to contact NMMA if there is anything the Commission may need from the recreational marine industry in this endeavor. You may contact Jeffrey Gabriel of my staff at (202) 721-1614 or email at jgabriel@nmma.org for further assistance throughout this process.

Sincerely,



Monita W. Fontaine, Esq.
Vice President, Government Relations