



November 24, 2003

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

Dear John:

On behalf of the National Telecommunications Cooperative Association (NTCA) and its membership of 566 telephone companies I submit these written comments in support of rulemaking petition: Payroll Deduction Contributions to a Trade Association's Separate Segregated Fund.

I submit this appeal asking the FEC to amend Section 114.8(e)(3) of its regulations that prohibit the corporate members of our trade association, NTCA, from using a payroll deduction system to facilitate and administer the voluntary contributions to our separate segregated fund.

Due to the historic, limited, yet involved nature of our solicitation of our restricted class, modifying Section 114.8(e)(3) to allow such payroll deductions would yield dramatic efficiencies in the time and expense that are currently associated with this annual endeavor.

Our corporate members have expressed on numerous occasions their desire for the payroll deduction option, as well as other individuals currently involved with our SSF. The option of payroll deductions would go a long way toward meeting their desire to give more to the SSF which many of them can not afford to do in a one time lump sum offer. A payroll deduction approach to contributing to SSF's is the most straightforward process for all involved in the administration of such contributions.

Since 1969, the NTCA membership has maintained an SSF to provide support to congressional candidates concerned about telecommunications in rural America. NTCA's SSF is the epitome of what SSFs are all about – providing tools for people with

common interests to pool their resources to help candidates they believe understand their interests.

Ours is a small SSF when compared to those that are managed by the nation's largest telecommunications giants against whom our members compete in many forms. The current regulations of Section 114.8(e)(3) negatively impact the chances of our members fairly competing with these large entities, in the political arena. We believe that everyone should be on the same footing.

The current regulations of restricting corporate members to tangible contributions does not comply with Section 114.8(e)(3) that states "There 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-" --yet we are restricted from using this most obviously helpful tool. We urge you to modify your regulations accordingly.

Thank you for your consideration of these critical issues.

Sincerely,

Tammie Logan

Tammie Logan
Government Affairs
Representative

Ms. Tammie Logan
NTCA
4121 Wilson Blvd., 10th Fl.
Arlington, VA 22203
tlogan@ntca.org
Tel: 703-351-2038
Fax: 703-351-2036