



"Schneider,Lori" <schneiderl@actforchildren.org> on 04/09/2004 09:32:15 AM

To: politicalcommitteestatus@fec.gov

cc:

Subject: comments

Attached are comments on the proposed rules for political committee status.  
Thank you,  
Lori Schneider

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The Day Care Action Council of Illinois is now  
Action for Children

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April 8, 2004

**Via electronic mail**

Ms. Mai T. Dinh  
Acting Assistant General Counsel  
Federal Election Commission  
999 E Street NW  
Washington, D.C. 20463

Re: Notice of Proposed Rulemaking on Political Committee Status

Dear Ms. Dinh:

Action for Children is submitting these comments in response to the FEC's Notice of Proposed Rulemaking regarding Political Committee Status issued on March 11, 2004. The FEC's intent is to ensure that activities which may affect federal elections are properly regulated so as to prevent circumventing the Federal Election Campaign Act. In fact, implementing the proposed rules would go far beyond what Congress intended with the McCain-Feingold legislation and what the Supreme Court upheld in *McConnell*. The proposed rules fail to achieve their objective, and worse, actually deter education initiatives, stifle freedom of speech and most tragically, discourage voter registration and turnout on election day.

For the reasons detailed below, Action for Children is strongly opposed to the proposed rules and urges the FEC to withdraw them.

Action for Children is a non-profit organization exempt from federal income taxation under section 501(c)(3) of the Internal Revenue Code. Our mission is to create a common voice and vision for advancing high quality and accessible programs that foster the development, health and well being of all Illinois children. Each year we serve approximately 190,000 families and 63,000 child care providers as the child care resource and referral agency for Cook County, Illinois. In addition our public policy and advocacy program works directly with a statewide grassroots membership of parents and early childhood professionals to educate law and policy makers and advocate for systems of early learning that are responsive to the needs of families and their children.

The daily challenges that low-income families face to make the best possible lives for their children are tremendous. Central to our mission is empowering parents to make the best possible choices for their families. As such, we work with parents to encourage

them to become a part of the democratic process, register to vote, educate themselves on public policies and share their opinions with elected officials. The effect of the proposed rules would be to stop our efforts of parent education for fear of being classified a “political committee.”

Action for Children is already prohibited from intervening in political campaigns as a 501(c)(3) organization. We support or critique issues—not individuals—that impact working families and their children. Under the proposed rules, we could be curtailed from listing information about a bill, including merely the sponsor names for fear the activity be seen as one that “promotes, supports, attacks, or opposes” a candidate. Parents deserve to know how to research and take action on proposed public policies that may affect their families. The proposed rules would essentially stop any education or advocacy on policy issues during an election cycle.

Under the proposed rules, Action for Children could potentially be prohibited from urging our members to register to vote or encouraging them to actually turn out on election day. To restrict us from encouraging members to vote would cripple our education and advocacy efforts. More importantly, this is not good for children or their families. Action for Children’s members are low-income working parents and early education professionals speaking out for what is best for children. This is a population that will only be heard if they are recognized as voters. As a country, we should be encouraging civic participation by all individuals, especially those traditionally disenfranchised, not regulating it out of existence.

The effect of the proposed rules would be both to limit Action for Children’s ability to communicate with our members on issues important to them and bar us from participating in *non-partisan* voter registration activities. Both activities are essential to our organization’s mission, but more importantly, go to the core of democracy itself. They should be encouraged, not curtailed. The FEC should be commended for attempting to ensure that federal campaigns are fair and conform to the law. The proposed rules however, go far beyond both the intent of Congress and the holdings of the United States Supreme Court. They will do more harm than good to the democratic process and should be withdrawn with no further action.

Respectfully submitted,



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