



Bob Frank <rfrank@CCEBOS.ORG> on 04/01/2004 04:47:13 PM

To: "politicalcommitteestatus@fec.gov" <politicalcommitteestatus@fec.gov>
cc: Dan French <dfrench@CCEBOS.ORG>, Communications Committee <Communications@CCEBOS.ORG>

Subject: Comments on proposed new regulations, for hearing of April 14

Ms. Dinh, thanks for soliciting comments. I have attached ours.

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1135 Tremont Street, Suite 490
Boston, MA 02120

April 1, 2004

Ms. Mai T. Dinh, Acting Assistant General Counsel
Federal Election Commission
Washington, DC
politicalcommitteestatus@fec.gov

Dear Ms. Dinh,

We're responding to your invitation to comment on the proposed new regulations governing political advocacy by non-profits in Federal elections, for the hearing coming up April 14.

While we do understand the purpose of the new proposals is to prevent circumvention of McCain-Feingold, the problem is that the possible implications add an onerous burden to organizations like us. We have, as one part of our mission, a commitment to advocate for good education reform, as we see it. We can be involved in support meetings, distribution of information, alerts about what we see as unenlightened education proposals (including at the Federal level), and so forth.

It is probably unlikely that the proposed new regulation would legally apply to our activities, but it is certainly the case that such regulation would create a new layer of Federal interference and bureaucracy that we doubt you intend and that certainly we can't afford. We would need to be concerned about whether this or that activity could jeopardize something about our non-profit advocacy status. We would need to hire legal advice that our strapped budget cannot afford. We may need to think twice about our advocacy activity—an unhealthy hesitancy in a democracy and surely not what you intend.

In short, we are asking you not to create another layer of bureaucracy on non-profits who are committed to helping the country improve the lives of its citizens. The complex set of rules you are considering is simply not worth it and would have an unintended stifling effect on us.

Thank you very much for soliciting comments on this proposal.

Respectfully

Robert Frank
Director of Communications