



the praxis project

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COUNSEL
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with the praxis project

Ms. Mai Dinh
FEC, Acting Assistant General Counsel
999 E. Street, NW
Washington, DC 20463

Dear Ms. Dinh,

We, at the Praxis Project, are writing to express our concern regarding the proposed rules on Political Committee Status (being considered under Notice 2004-6). We recommend that these rules not be adopted and strongly urge all commissioners to reject them.

The proposed rules would restrict the ability of nonprofit organizations to engage in issue advocacy, to conduct nonpartisan voter participation activities, and even to communicate with our members on policy matters. These activities are important tools that nonprofit organizations use to educate and engage the public in the democratic process.

It is certainly appropriate for the FEC to evaluate relevant rules and processes periodically. However, it is inappropriate for the Commission to change the campaign finance rules in the midst of this election cycle, and further, to implement the rules retroactively.

The proposed rules would regulate any group that "promotes, supports, attacks, or opposes" candidates for federal office. This language is vague. In addition, it is unclear whether such issues are within the FEC's jurisdiction. Rushing through these regulations without clarity of intent or jurisdiction will only lead to confusion.

Although The Praxis Project is a nonpartisan organization, we cherish our ability to communicate with the public about important policy issues. Nonprofit organizations provide important research, information, and perspectives to public debate that are often underrepresented. The proposed rules threaten our ability to exercise that right of participation and abandon this critical public forum almost entirely to private interests.

Thank you for your time and understanding. Please vote against these rules.

Sincerely,

The Praxis Project