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April 2, 2004

Ms. Mai T. Dinh
Acting Assistant General Council
Federal Election Commission
Fax (202) 219-3923

Dear Ms. Dinh,

I am writing on behalf of my organization's more than 6,000 member and supporting households in regard to the Federal Election Commission's decision on March 4, 2004 to approve the Notice of Rulemaking (NPRM) on the subject of political action committees, 527 organizations and voter mobilization.

The FEC's proposed rules, if approved, will drastically change the breadth and scope of how non-profits operate this year. It is of great significance that these changes are timed to go into effect in the heat of a national election season when the voices of nonprofits fill the void on many critical issues.

The NPRM's expansive definition of federal political committees will hurt nonprofit groups across the political spectrum and restrict First Amendment freedoms in ways that are unhealthy for our democracy. These changes will impoverish political debate and could act as a de facto "gag rule" on public policy advocacy. As a result of these rules, public officials will be isolated from substantive criticism for their policy positions and civic participation in our government will be diminished.

In addition to the NPRM's overly expansive definition of political committees, the "look back rule" is particularly problematic and could have far-reaching effects such as freezing issue advocacy efforts in mid-stride. Retroactive application of new financial restrictions and classifications that require nonprofits to pay back soft money used in the current and previous years for newly defined hard money activities effectively punishes nonprofit groups for following the rules. Further, the NPRM requires new federal political committees to pay off all debt as a result of these rules changes before conducting any new activities. These measures are both extreme and unjust.

First Amendment protected free speech and civic engagement help us to ensure a healthy and vibrant democracy. Our government's policies and regulations must support these rights and activities. Congress has supported, and the Supreme Court upheld, the McCain-Feingold campaign finance reform law. Better that support be given to assessing and improving the adequacy of McCain-Feingold than changing the rules in the midst of an election year and imposing retroactive financial requirements. The FEC should not adopt these rule changes.

Sincerely,

Robert Moore

The Rev. Robert Moore
Executive Director