



REV. JOE BLANKINSHIP
DIRECTOR OF MUSIC, STAN GRADY
DIRECTOR OF EDUCATION & YOUTH, BETH UTLEY
SECRETARY, KAY HAYNES

March 31, 2004

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

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Dear Ms. Dinh;

You are seeking public comment on rules regarding political committee status. After reviewing the proposals I have the following comments.

Campaign finance reform was not meant to gag public interest organizations. These rules seem to do just that. As a non-profit religious organization I believe we are threatened to be reclassified as a political organization should we in any way encourage responsible voter participation. The proposed rules would mean that by making comment on the policy position of a sitting politician or a candidate we would be at risk of losing our status as a church and have donor restrictions placed on us. This shows a clear misunderstanding of what the campaign reform law was all about

It is my understanding that nothing in the McCain-Feingold campaign reform law or the Supreme Court's decision upholding it provides any basis for these rules. That law is only about banning federal candidates from using unregulated contributions ("soft money"), and banning political parties from doing so, because of their close relationship to those candidates. It's clear that, with one exception relating to running broadcast ads close to an election, the new law wasn't supposed to change what independent nonprofit interest groups can do, including political organizations (527's) that have never before been subject to regulation by the FEC.

The rules changes being considered are troubling not only for my church but for my denomination as well. In fact, any kind of nonprofit, religious, secular, social service, charitable, educational, civic participation, issue-oriented, large, and small -- could be affected by these rules. And as I read it, a vast number would be essentially silenced on the issues that define them.

Please note my strong opposition to these proposed rules.

Sincerely,

Rev. Joseph J. Blankinship

cc: Senator John R. Edwards
Senator Elizabeth Dole
Congressman Melvin L. Watt