

International Brotherhood of  
**BOILERMAKERS • IRON SHIP BUILDERS**

**BRIDGET P. MARTIN**  
ASSISTANT TO THE INTERNATIONAL PRESIDENT  
DIRECTOR OF GOVERNMENT AFFAIRS



**BLACKSMITHS • FORGERS & HELPERS**

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March 26, 2004

Mai T. Dinh, Acting Assistant General Counsel  
Federal Elections Commission  
999 E Street NW  
Washington, DC 20463

Dear Mr. Dinh:

On behalf of the International Brotherhood of Boilermakers, Iron Shipbuilders, Blacksmiths, Forgers and Helpers, I write to express our opposition to the Federal Election Commission's (FEC) proposed rule changes issued March 4, 2004. This troubling proposal to silence groups from voicing their views about the policies of the Administration and other federal officeholders raises serious concerns, especially in the middle of an election year.

These rules would shut down the legitimate activities of our union to inform our members and the general public of our views. Unions in particular have a longstanding history of speaking out on public issues and officeholders, registering voters, and enhancing civic participation. Under the proposed rule, unions would be forced to reduce or forgo these vital activities supported by our members. Obviously, it would be impossible for unions to become federal PACs – register and report to the FEC, accept contributions only from individuals and other PACs, accept no contribution more than \$5,000, and adhere to the other onerous restrictions proposed by the FEC.

Nothing in the Bipartisan Campaign Finance Reform Act or the Supreme Court's decision upholding it empowers the FEC to adopt these rules. The law only bans federal candidates and political parties who sponsor them from using unregulated soft-money contributions. With the exception relating to running broadcast ads mentioning candidates close to an election, the new law was not intended to interfere with the advocacy and voter education activities of nonprofit groups and unions that have never been subject to such intrusive regulation by the FEC.

Further, should the FEC issue any new regulations, it is unfair and disruptive to apply them to the 2004 election. Unions have relied on the current rules and undertaken significant commitments, and time is needed to adjust to any rule changes. Just as the

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FEDERAL ELECTIONS COMMISSION  
OFFICE OF THE GENERAL COUNSEL

McCain-Feingold law was put in effect for the election following its enactment, so should any new rule changes be delayed until unions and other nonprofit groups are afforded adequate time to adjust and ensure compliance.

Thank you for your consideration of this important matter.

Sincerely,

A handwritten signature in black ink that reads "Bridget P. Marti". The signature is written in a cursive, slightly slanted style.

Bridget Marti  
Assistant to the International President  
Director of Government Affairs

BM/afb

cc: Newton B. Jones, International President  
Karen Ackerman, Political Director, AFL-CIO  
Larry Gold, General Counsel, AFL-CIO