

March 25, 2004

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Ms. Mai T. Dinh
Acting Assistant general Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

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Dear Ms. Dinh,

I am outraged upon hearing of the newly proposed regulations your commission is trying to enact which would redefine and broaden the scope of a political committee to include non profits and labor unions who spend over \$1000 in federal political contributions, voter registration, GOTV or on any public communication that states an opinion on an issue. These new rules would in effect outlaw groups from speaking out about the policies and records of President Bush and other officeholders who are federal candidates and are a direct threat to our First Amendment rights.

There is nothing in the McCain-Feingold law or in the Supreme Court's decision upholding that law which empowers the Federal Election Commission (FEC) to adopt such rules. The law is only about banning federal candidates from using soft money, and banning political parties who sponsor those candidates from doing so as well.

The FEC's rationale behind these proposed rules defies logic. The FEC isn't fixing any problems with the proposed rules, but is merely putting new burdens on the non-federal section of 527 groups. Non-federal 527 groups do important issue education, voter mobilization and public advocacy. When Congress enacted a public disclosure law requiring 527's to make a full reporting of their finances to the IRS they did not intend to restrict their independent speech and activities.

I am also appalled with the timeline should such discriminatory rules have the misfortune of being enacted. When McCain-Feingold was passed in March of 2002 it did not go into effect until after the November 2002 election. This consideration should also be applied if your changes are enacted as well.

Sincerely,



Roy R. Roberts
N9648 Betts Rd.
Eagle, WI 53119

Cc; Rep. Paul Ryan

Senator Herb Kohl

Senator Russ Feingold