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November 29, 2001

Rosemary C. Smith,
Assistant General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463
Fax: 202/219-3923
Email: internetprm@fec.gov

Re: Proposed Rules regarding Internet campaign activity

Dear Ms. Smith:

We send with this (by fax, mail, and email) the *Comments on Proposed Rules at 11 C.F.R. Parts 100, 114 and 117, The Internet and Federal Elections; Candidate-Related Materials on Web Sites of Individuals, Corporations and Labor Organizations* by the James Madison Center for Free Speech (in response to a notice published at 66 Fed. Reg. 50358, October 3, 2001), incorporated herein by reference. Notice is hereby given that Mr. James Bopp, Jr., General Counsel for the James Madison Center for Free Speech, wishes to testify orally concerning the proposed rulemaking in the event a hearing is scheduled on this matter.

I. The Spectrum of Campaign Activity and the Measurement of "Value"

The Supreme Court and the FEC have recognized that there is a large spectrum of activity which encompasses "campaign activity." On one pole of the spectrum is the recognition that "resources amassed in the economic marketplace may be used to provide an unfair advantage in the political marketplace." *FEC v. Massachusetts Citizens for Life, Inc.* ("*MCFL*"), 479 U.S. 238, 257 (1986). Thus, the government may constitutionally restrict corporations' campaign activities to prevent the corruption of the electoral process by the seemingly unlimited expenditure of corporate funds into the political marketplace. On the other end of the spectrum is *de minimis* activity which poses little, if any, threat to the electoral process and is consequently not regulated. The FEC has recognized that some campaign activity inherently lacks the prerequisite value to be regulated. For example, 11 C.F.R. § 114.9, the "Occasional Use Exemption", allows for "occasional, isolated, or incidental use" of corporate or labor organization facilities in connection with a federal election without regulation.

Apparent in the FEC's proposed rule is the presumption of "value" that is attached to hyperlinks, candidate endorsements, or other Internet campaign activity. A hyperlink, candidate endorsement, or individual Internet campaign activity can only be deemed a contribution or expenditure if it is of "value." It becomes necessarily vital to establish an accurate method by which one calculates "value." There are two accurate means by which this may be done. First, the FEC may calculate the "value" of Internet campaign activity in the same manner it does for several other activities – by assessing the market value of the activity in question.[1] The market value provides an accurate and objective determination of the true monetary worth of any given Internet campaign activity. Second, the FEC may calculate "value" as a measure of the actual cost an entity pays for a given service or product. Further, the Code of Federal Regulations incorporates both measures to determine "value."[2] As will become apparent under either approach, the Internet campaign activity at issue lacks any such determinable value due to its minimal worth.

In the proposed rules, the FEC seeks to regulate certain Internet campaign activity based upon its potential value as a contribution or expenditure. Each Internet campaign activity highlighted in the proposed rules carries with it minimal cost or value. The FEC already recognizes the "occasional, isolated, or incidental use" by employees of corporate or labor organization facilities in connection with a federal election as an activity not subject to regulation. Such activities are presumably not subject to regulation because of their low-value and correspondingly low potential of corruption to the electoral process.

The evaluation of any campaign activity should not be based upon the subjective worth of the communication but rather upon its objective worth. The Occasional Use Exemption does not analyze the value of the use of an employer's facilities in connection with a federal election under a subjective evaluation. Rather, it evaluates whether such use is subject to regulation based on objective hourly data.[3] It does not matter if the use is subjectively more valuable because it is performed by a famous employee or the president of the corporation. It simply analyzes the value of the activity based on the number of hours of such use. Similarly, 11 C.F.R. 100.7(a)(1)(iii)(A)-(B) measures costs of goods or services based on the objective "usual and normal charge" standard. Likewise, any proposed

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[1]One example of the FEC's use of an objective market standard to determine value is embodied in 11 C.F.R. § 100.7(a)(1)(iii)(A)-(B). This provision determines the value of advertising services by the "usual and normal charge" for such a service. Further, the "usual and normal charge" consists of the "hourly or piecework charge for the services at a commercially reasonable rate."

[2]11 C.F.R. § 100.7(a)(1)(iii)(A)-(B) typifies a market value approach, while 11 C.F.R. § 114.9(a)(iii) measures value according to the cost incurred by the entity.

[3]11 C.F.R. § 114.9(a)(iii) notes that "[a]ny such activity which does not exceed one hour per week or four hours per month . . . shall be considered as occasional, isolated, or incidental use of the corporate facilities."

regulation of Internet campaign activity should evaluate "value" not by the subjective importance of the Internet communication but by the objective costs associated with such a medium.

II. The Constitutional Framework Appropriate for Internet Campaign Activity

The beginning of any analysis regarding the regulation of political speech requires an introduction to the constitutional framework which governs such speech. In brief, two seminal cases provide much assistance with this effort. *Buckley v. Valeo*, 424 U.S. 1 (1976), and *Austin v. Michigan Chamber of Commerce*, 494 U.S. 652 (1990), lay the foundation for determining the constitutionality of rules which regulate campaign activity. Both cases allow for some regulation of campaign activity due to the threat of candidate corruption from large contributions or corruption of the electoral process by large influxes of money from corporations and labor unions.

Buckley and *Austin* establish the only recognized interests in restricting vital electoral speech. *Buckley* was concerned with multi-million dollar gifts, and a resulting *quid pro quo*, i.e., contributions for political favors. The *Austin* Court was concerned with the corruption of the entire electoral process from an influx of money from the economic marketplace into the political marketplace. Further, it is recognized that when government acts to restrict political speech, it must have a compelling interest which is narrowly tailored to accomplish such a goal. *Austin*, 494 U.S. at 657 (citing *Buckley*, 424 U.S. at 44-45). Only the interests announced in *Buckley* and *Austin* have been recognized as compelling interests to regulate electoral speech. *FEC v. National Conservative Political Action Comm'n*, 470 U.S. 480, 496-497 (1985).

In addition to regulating electoral speech, the FEC's proposed rules regulate speech that occurs in the medium of the Internet. In determining the constitutionality of a given restriction on speech, it is necessary to consider the medium in which such speech takes place. *Southeastern Promotions, Ltd. v. Conrad*, 420 U.S. 546, 557 (1975) (noting that every medium of expression "must be assessed for First Amendment purposes by standards suited to it.") Quite simply, the Internet represents the most participatory marketplace of mass speech that this country has ever seen. *ACLU v. Reno*, 929 F. Supp. 824, 881 (E.D. Pa. 1997) (Dazell, J., concurring), *aff'd*, 521 U.S. 844 (1997). The Internet is both a "a vast library including millions of readily available and indexed publications" and "a vast platform from which to address and hear from a worldwide audience of millions of readers, viewers, researchers, and buyers." *Reno v. ACLU*, 521 U.S. 844, 853 (1997). Unlike most other media formats[4], costs associated with speech on the Internet are minimal. As such, the Internet represents the greatest potential for an uninhibited and robust exchange of political speech. Such implications influenced Judge Dazell to note in his concurrence that "the Internet deserves the broadest possible protection from government-imposed, content-based regulation." *Reno*, 929 F. Supp. at 881.

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[4]The Supreme Court has noted that the justifications for the regulation of other broadcast media are not present in cyberspace. *Reno*, 521 U.S. at 866.

It is with such a framework in mind that one may properly analyze the constitutionality of the FEC's proposed rules. The FEC has proposed three such rules which would regulate campaign activity on the Internet. Each of the rules must have an accompanying compelling governmental interest that is carried out in a narrowly tailored manner. As is made evident below, it is doubtful that any of the proposed regulations satisfy so rigorous an examination.

III. A Constitutional Analysis of the Proposed Rules

A. None of the Proposed Rules Satisfy Constitutional Analysis Because Internet Costs are *De Minimis*

The FEC proposes three regulations of Internet campaign activity; each of which have a *de minimis* value associated with them. However, the animating rationale behind limiting corporations and labor unions from engaging in express advocacy is to protect the electoral process from corruption by limiting the influx of such organizations' money into the political marketplace. Thus, the proposed Internet campaign activity must pose a credible threat of such effect upon the electoral process. This threat is not present in Internet campaign activities because the associated costs, measured by either market value or the price the entity pays, are so low as to be nearly immeasurable. Reviewing these costs demonstrates the nominal monetary amounts involved in such endeavors. The Internet then, in effect, becomes a level playing field for political speech. With the advent of frequent free web space and free Internet access, the Internet has become a medium in which entry costs are not a barrier for most. As contrasted to other traditional media outlets, where most individuals have little chance to speak due to financial barriers, the Internet eliminates the risk of corporations monopolizing the political marketplace with their voice. Accordingly, the rationale to limit corporate political speech evaporates in the medium of the Internet.

The FEC should not regulate the Internet campaign activity contemplated in the proposed rules because it, like other limited recognized campaign activity, carries only a *de minimis* value. The market price or cost to an entity of a hyperlink or other Internet campaign activity undeniably reflects the objective value of the link. It has become exceedingly clear that, with the continued dramatic increase in the size of the Internet, associated Internet campaign activity cost is minimal, especially in such areas as hyperlink and press release creation.

B. Each of the Proposed Rules are Not Justified

1. The Individual Exemption

The first proposed rule[5] exempts individual Internet campaign activity from constituting a contribution or expenditure in certain instances. However, it also notes that if an individual engages in "Internet activity for the purpose of influencing any election" with "equipment, services, or software owned by an individual's employer" that such activity may be considered a contribution or expenditure. 66 Fed. Reg. at 50,362. The proposed rule goes on to note that even volunteer activity on the employee's own time may be subject to such regulation. *Id.*

The James Madison Center for Free Speech applauds the FEC's adoption of the"occasional, isolated, or incidental" exemption embodied in 11 C.F.R. § 114.9 as applied to an employee's use of a corporation's or labor organization's technological resources. *Id.* However, there is one further potential use of corporate or labor organization technological resources that should be accounted for in the proposed regulation. While the "occasional, isolated, or incidental" use exemption protects employees engaged in individual political speech completed with corporate or labor organization resources, it does not adequately protect individuals who are given corporate property as part of their compensation package. The "occasional, isolated, or incidental" use exemption did not contemplate the advent of the "home office" where corporations give employees resources as part of a compensation package to use both personally and professionally.

Often, corporate employees are given a notebook computer for both business and personal use. As such, the notebook is given as part of a compensation package and is almost indistinguishable from other related benefits such as a corporate automobile. However, such computers are often paid for by, and registered in the name of, the corporate entity. It then becomes challenging to address how the regulation of an individual's Internet campaign activity, which takes place on a quasi-personal notebook computer, advances any interest in restricting the overwhelming corporate voice in the electoral process. Such a rule regulates *individual* speech published through corporate resources; it does not regulate the influx of corporate and labor organization expenditures into the electoral process. Under such a rationale, the FEC could regulate individuals' campaign uses of corporate automobiles or could require individuals to pay for campaign activities with personal funds not derived from a corporate entity.[6]

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[5]The Internet and Federal Elections; Candidate-Related Materials on Web Sites of Individuals, Corporations and Labor Organizations, 66 Fed. Reg. 50,358, 50,362 (2001) (to be codified at 11 C.F.R. 117.1) (proposed Oct. 3, 2001).

[6]The FEC effectively claims that it may broadly regulate an individual's campaign activity that is tangentially related to corporate resources. Under this reasoning the FEC could claim to regulate corporate automobile usage and individual salary expenditures in relation to campaign

(continued...)

In order for the FEC to constitutionally regulate this type of Internet speech, it must have a compelling interest which is narrowly tailored. *Austin*, 494 U.S. at 657 (citing *Buckley*, 424 U.S. at 44-45). The restriction of mass corporate money into the political marketplace represents one such valid compelling governmental interest in preventing the corruption of the electoral process. *Id.* at 660. It is problematic to assume that a regulation on individual electoral speech through quasi-personal corporate technological resources somehow advances the government's interest in shielding the political marketplace from the massive corporate voice. There is virtually no risk of corrupting the electoral process by allowing a corporate or labor organization's employee to freely and independently engage in electoral Internet speech. Such a regulation may effectively silence or hinder the political speech of citizens who are given corporate resources as part of a compensation package.

The proposed rules also require a clarification of the phrase to "engage in Internet activity for the purpose of influencing any election." As written, it is unclear what type of communications are covered under the "for the purpose of influencing" language. "[F]or the purpose of influencing" should apply to both issue advocacy and express advocacy communications. The Supreme Court recognized a distinction between issue advocacy and express advocacy in *Buckley* for purposes of constitutional analysis. 424 U.S. at 79-80. Express advocacy includes explicit or express words of election or defeat of a clearly identified candidate. *Id.* at 44. Issue advocacy lacks explicit words of election or defeat but otherwise praises or criticizes a candidate for his or her position on a given issue. *MCFL*, 479 U.S. at 249. *Buckley* interpreted "to influence" to mean express advocacy. 424 U.S. at 79-80. Therefore, the FEC should expand its proposed rules to include an expanded definition of "for the purpose of influencing any election." The definition should extend to cover both issue advocacy and express advocacy as this would provide clarity to the proposed rule and would allow individuals to engage in either type of speech.

2. Regulated Hyperlinks

The second proposed rule[7] seeks to clarify the regulation of hyperlinks on corporation and labor organization web sites. Three conditions must be met so that such a hyperlink is not considered a contribution or expenditure. The last such condition requires that if the "hyperlink is anchored to an image or graphic material, that material may not expressly advocate" and the "text surrounding the hyperlink . . . may not expressly advocate." 66 Fed. Reg. at 50,364. It is precisely this limitation which fails to pass constitutional muster as it does not address any interest in preventing corruption of the electoral process.

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[6](...continued)
activities because of the link between the corporate resources and the campaign activity. Such an expansive reading of the basis for the FEC's regulatory power unduly infringes upon individuals' First Amendment rights.

[7]66 Fed. Reg. at 50,364 (to be codified at 11 C.F.R. 117.2).

a. Hyperlinks Possess Very Little Value and Consequently Should not be Regulated

The animating rationale behind limiting corporations and labor unions from engaging in express advocacy is to protect the electoral process from corruption by limiting the influx of such organizations' money into the political marketplace. *Austin*, 494 U.S. at 660. In order for such a proposed rule to comport with this rationale, it must identify the value, or monetary worth, of a hyperlink and its alleged threat of corruption to the electoral process. Hyperlinks, by their very nature, possess little ascertainable value. In fact, the creation of a hyperlink carries a *de minimis* value and is directly comparable to the "occasional, isolated, or incidental use" exemption embodied in 11 C.F.R. § 114.9. As an example, the creation of a hyperlink simply requires an individual to type <A HREF = "http://www.domainname.com"> title' </A>. The effective cost of this hyperlink is exceedingly low and carries an approximate value of eighty-five cents.[8] The FEC should recognize the *de minimis* value of Internet campaign activity and the proposed rules should not seek to regulate it because of the minimal threat of corruption associated with such low-value activities.

The FEC's proposed rule explicitly states that "the hyperlink will only be exempt if the corporation or labor organization does not charge or charges only a nominal amount for providing hyperlinks to other organizations." 66 Fed. Reg. at 50,364. Yet the proposed rule goes on to regulate such extremely low value activity. Other *de minimis* campaign activities, such as the "occasional, isolated, or incidental use" exemption, are not regulated precisely due to their inherently low value. Because hyperlinks are of infitesimal value, they pose no threat to the electoral process and should not be regulated; just as other campaign activities of *de minimis* value are not subject to regulation.

b. The Threat of Corruption Through Express Advocacy Hyperlinks is Minimal

That a corporation may include express advocacy in an anchored graphic or in text surrounding a link does not pose a threat of corruption to the electoral process. Corporate entities or labor organizations will not monopolize and flood the political marketplace by producing "express advocacy hyperlinks" on their web sites. As such, the proposed rule does not directly advance a governmental interest in preventing the corruption of the electoral process. The FEC should not

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[8]The median salary for content engineers in Chicago, Illinois is $67,284. *Salary.com Salary Wizard* (visited November 15, 2001) <http://www.salary.com>. If the engineer types thirty words per minute, a low figure, it would take him 1.47 minutes to type the forty-four character hyperlink. The engineer is effectively paid $35.33 an hour. As such, the engineer makes fifty-eight cents a minute. Thus, 1.47 minutes of his time creating the hyperlink has a value of eighty-five cents. Other costs do, of course, factor into determining the value of a hyperlink but many of them are sunken costs, e.g. they are already paid for, such as server and storage costs or bandwidth allocations.

regulate corporations' or labor organizations' use of hyperlinks at all but should rather exempt all such hyperlinks from regulation under a *de minimis* exception.

3. Candidate Endorsement Press Releases

The third proposed rule[9] allows for corporations to make press releases endorsing candidates in certain situations. Specifically, only a corporation which "ordinarily makes press releases available to the general public on its web site" may endorse candidates. 66 Fed. Reg. at 50,365. The proposed rule also seeks to limit the press release to the endorsement and reasons for the endorsement. *Id.* Any such press release must be "made available in the same manner as other press releases made available on the web site." *Id.* Lastly, the associated costs must be *de minimis*. *Id.* The proposed rule allows limited candidate endorsement by corporations but, in doing so, unduly restricts many corporations' ability to speak as well as the manner in which such speech may occur.

a. Internet Press Releases are Inexpensive and Should not be Regulated

The objective cost of an Internet press release, like the creation of a hyperlink, is exceedingly minimal. While the creation of a hyperlink may take 1.47 minutes, an individual web page would normally include hundreds of plain-text characters along with several hyperlinks. Further, there are at least two methods by which the value of a single web page could be calculated. One could calculate the cost to the entity based upon the earlier assumption of an in-house content engineer. It is most likely that a content engineer would take a pre-written press release and convert it to Hypertext Markup Language ("HTML") for posting. One could speculate that with today's advanced HTML editors encompassed in popular software office suites that the task of creating a simple press release could be completed in less than five minutes. Assuming the same hypothetical content engineer converted a press release into an HTML version and published it in 5 minutes, the press release would have an associative cost of $4.25 plus initial drafting costs.[10]

One could also calculate the cost of creation based upon the average market price for web page services. However, this rate would undeniably be higher than the average corporation's cost as the calculation involves the use of third-party content engineers or web publishers. Given the resources and technologies of corporations, it is doubtful that a corporation would outsource its web site maintenance to a third party when it could be completed more efficiently in-house. Assuming a corporation did contract for third party web site maintenance, a random sampling of ten web site companies demonstrates that the price for an individual HTML page ranges from between fifteen and

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[9]66 Fed. Reg. at 50,364 (to be codified at 11 C.F.R. 117.3).

[10]This is based on the content engineer earning fifty-eight cents per minute.

one hundred dollars.[11] In contrast to the accepted theory that a corporation's political speech may be restricted to prevent its massive influence in an election, an expenditure for HTML page creation is of *de minimis* value. As demonstrated, HTML page creation costs little, is a relatively easy entry point of communication for all speakers and the policy considerations to justify limiting other forms of corporate political speech simply are not present here.

Just as present regulations currently recognize that other activities which possess minimal value or threat of corruption should not be regulated, so to should the proposed rules. In order for the proposed rules to constitutionally regulate the issuance of candidate endorsement press releases, the government must have a compelling interest in regulating them. *Austin*, 494 U.S. at 657 (citing *Buckley*, 424 U.S. at 44-45). Such interest, as noted earlier, is normally associated with preventing corruption of the electoral process by prohibiting the large influx of money into the political marketplace. The creation of a single candidate endorsement press release, or several, carries minimal value. Thus, the government lacks a compelling interest to regulate such speech as there is no threat of corruption in a medium which is so inexpensive and which, through its low-cost characteristics, is completely open to a diverse array of voices, none of which has the potential to monopolize the medium.

b. The Rule Fails to Survive Constitutional Scrutiny

The FEC proposes that corporations which have made press releases available to the general public in the past may now make press releases which endorse candidates. 66 Fed. Reg. at 50365. However, corporations which have not made press releases available to the public in the past are presumptively not allowed to make such endorsements. It is unclear what compelling governmental interest, if any, is advanced by prohibiting corporations which have not made public press releases before from issuing candidate endorsement press releases. The prevention of corruption does not justify restricting corporations which have not previously made press releases from endorsing candidates. The proposed rule irrationally and unconstitutionally distinguishes between corporations which have made public press releases available and those that have not; a distinction not supported by any compelling governmental interest.

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[11]The following sites constituted the random sampling and prices reflect the cost to create an individual HTML page: http://www.custombizsites.com ($75), http://www.frontierix.com ($60), http://www.accesscomputing.com/az/index.htm ($35), http://www.engineers.com/web.htm ($50), http://www.lightcreations.com/pricing.html($15), http://www.welcome2premier.com/premier_web_services/pwprices.html ($15), http://www.webcreationservices.com/pricing.htm ($75), http://www.sitesbysteve.com/fees.html ($100), http://www.tucsonwebcreation.com/web_design_pricing_and_services.htm ($25), http://www.mclaughlinwe.com/price.htm ($20).

The FEC also seeks to limit the content of the press release to solely the endorsement and a "statement of the reasons therefore." *Id.* It remains unclear what compelling governmental interest is addressed by restricting the content of the endorsement to the endorsement itself and supporting rationale. Generally, a corporation would select only relevant topics to include in its press release endorsing a candidate; irrelevant information would be excluded. Accordingly, it makes little constitutional sense for the FEC to propose to regulate the content of a candidate endorsement. If a corporation wishes to create a press release endorsing a candidate and extolling the benefits of a product, so be it. The electoral process is not endangered by an overwhelming corporate voice simply because a corporation chooses to include additional information into an endorsement. Thus, the proposed content-based limitation must fail due to constitutional infirmity.

The proposed rule would regulate the manner in which an endorsement press release is published by requiring organizations to make it "available in the same manner as other press releases made available on the web site." *Id.* Again, this proposed rule creates a content-based restriction on candidate endorsements. As addressed earlier, what compelling governmental interest is served by restricting the manner in which a corporation publishes an endorsement? New formats of press releases do not threaten to corrupt the electoral process.

Lastly, the FEC requires candidate endorsement press release costs to be of a *de minimis* value in order that they be exempt from regulation. *Id.* Yet, if the press release is indeed of such minimal value, how does it threaten to corrupt the electoral process at all? If the press release is of *de minimis* value, it follows that no threat to the electoral process exists and the additional regulations are not required. Just as the FEC recognizes the fact that *de minimis* use of corporate resources in an "occasional, isolated, or incidental" manner is a non-regulated activity; this very rationale should extend to press releases as well.

Three of the four proposed rules regarding corporate political endorsements regulate political speech in a content-based manner. Electoral speech, as mentioned earlier, is afforded the greatest protection because it is at the heart of the First Amendment. Internet speech should also be afforded a similar level of protection due to its unique medium format. Content-based regulations are presumptively invalid and must pass strict scrutiny to be found constitutional. *Hill v. Colorado*, 530 U.S. 703, 769 (2000). The FEC effectively attempts to regulate the most highly protected speech, in one of the most highly protected media, in the most constitutionally-egregious manner. Because the proposed rules do not directly relate to a compelling governmental interest, e.g. the prevention of corruption, they are unconstitutional because they stifle political speech on the Internet in a content-based manner.

IV. Conclusion

From the analysis conducted above, it is apparent that the proposed rules are underprotective of the free speech rights of those engaged in the political marketplace of ideas. The proposed rules

laudably aim to protect general citizens from the potentially overwhelming voice of corporations and labor unions and purport to save the electoral process from corruption. However, the proposed rules lack any connection to such interests and sweep too broadly, infringing upon individuals free speech rights, in accomplishing their purported aims. For these reasons the proposed rules should be withdrawn and regulation of the Internet should be evaluated consistent with the First Amendment principles annunciated in this comment.

Sincerely,

BOPP, COLESON & BOSTROM

James Bopp, Jr.
Benjamin Barr