January 6, 2000

Rosemary C. Smith
Acting Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Notice of Inquiry, 1999-24

    We welcome the Commission's examination of the application of the Federal Election Campaign Act (FECA) to the Internet.

    The organizations submitting this comment, described in Attachment A, represent a wide range of interests and have different views on campaign reform and the constitutionality of FECA.[1] But we are united in our belief that the Internet is a unique communications medium whose very architecture and economics offer an opportunity to reinvigorate political discourse and improve the quality of the electoral process by providing a platform from which individuals can engage in political speech outside the control of candidates, political parties, and the traditional media gatekeepers. While many of our organizations do not participate in or comment upon federal election campaigns, many of our organizations use the Internet to communicate and organize on issues of public policy. We firmly believe that the democratizing potential of the Internet will be compromised if the Commission adopts a regulatory approach that seeks to apply to the Internet speech of individuals and organizations other than political parties and campaign committees the types of limitations imposed on the radio and television commercials of parties and campaigns. For these reasons, we welcome this inquiry.

    We strongly urge the Commission to proceed cautiously because we believe that the onset of the 2000 elections does not afford the Commission sufficient time to deal comprehensively with the complex and constitutionally significant issue of campaign-related speech on the Internet. As the Supreme

---

[1]Commenters have taken different positions on portions of FECA and other related issues. For example, the ACLU has argued that the limitation on the size of campaign contributions violates the free speech rights of campaign supporters. While People For the American Way ("People For") has not taken a specific position on the portions of FECA challenged by the ACLU, People For has argued that some limits on the amount of campaign contributions to candidates to achieve compelling government interests in the integrity of the democratic political process may be constitutional under the First Amendment and do not substantially infringe upon a contributor's ability to discuss candidates and issues. Along with other non-profit organizations, People For filed an amicus brief in Nixon v. Shrink Missouri Government PAC, No. 98-963, in support of the state of Missouri's limit of $1075 to candidates for statewide offices in this recently argued Supreme Court case.

Court made clear in its landmark decision on Internet speech,[2] understanding the medium is critical to adopting an approach that will effectively achieve valid public policy goals in a manner consistent with the First Amendment.

Rather than compelling swift resolution of all issues, the impending election offers both a reason for caution and an opportunity for study. This election may represent a turning point in the use of the Internet, a medium that may eventually break the dominance of television. In the midst of such change and experimentation, the Commission should not seek to regulate comprehensively but rather should use this opportunity to study how individuals and those not associated with the political parties or the candidates use this new medium. Only thereafter can the Commission safely identify any areas where regulatory intervention may be appropriate and consistent with FECA and Constitutional guarantees.

The only Commission action that is desirable at this time is to make it clear that the Internet speech of most individuals will be considered to fall below the threshold for FECA regulation. A simple rule on valuation of computer-related expenses will suffice to remove much of the cloud over the Internet advocacy of individuals and open up the use of the Internet. At this time unregulated Internet speech by individuals appears far more likely to advance than hinder the goals of FECA. Imposing on Internet political speech the rules designed for radio and TV is most likely to stifle political speech by the very individuals and organizations that FECA is intended to empower.

For these reasons, we urge the Commission to:

- **Delay any attempt at comprehensive rulemaking until after the 2000 election cycle;**
- **Create, through a clear statement on valuation, a "safe harbor" for Internet political speech by individuals during the 2000 election cycle; and,**
- **Take a cautious approach to online campaign-related activities during the 2000 election cycle by entities such as corporations, labor unions, educational entities, and non-profit entities, other than candidates, political parties, and PACs, acting narrowly in response to advisory opinion requests and complaints and to redress clear violations of existing law.**

---

[2] Reno v. ACLU, 521 U.S. 844 (1997). The Supreme Court based its decision on the District Court's detailed findings of fact, which remain perhaps the best statement of the relevant chracteristics of the Internet for purposes of First Amendment analysis. The District Court opinion is online at http://www.ciec.org/decision_PA/decision_text.html. The Supreme Courts's opinion is online at http://www.ciec.org/SC_appeal/decision.shtml

I. The Internet Is a Unique Medium, Whose Architecture and Economics Inherently Support Abundant, Inexpensive and Diverse Speech

The Internet, by virtue of its unique characteristics, advances the goals of the campaign finance law. The architecture and economics of the Internet offer a unique opportunity to achieve the thriving marketplace of ideas central to FECA's vision of healthy elections. The Internet is distributed, abundant, and relatively inexpensive. Its architecture severs the link between money and effective speech, turning individual citizens into speakers, and enabling cheap message distribution.

A. Fundamental characteristics of the Internet distinguish it from other media

The architecture and economics of the Internet distinguish it from the expenditures on mass media that figured so prominently when FECA was enacted.

-- Distributed, open and abundant

The traditional mass media (newspapers, radio and television) are based on systems of limited distribution channels under the control of a relatively small number of entities, or gatekeepers. In contrast, the Internet is decentralized, open and distributed, a network of networks consciously designed to function without gatekeepers. Thus, while the architecture of mass media creates scarcity, the Internet's architecture accommodates a virtually unlimited number of speakers. As the Supreme Court stated, "Unlike the conditions that prevailed when Congress first authorized regulation of the broadcast spectrum, the Internet can hardly be considered a scarce expressive commodity. It provides relatively unlimited, low-cost capacity for communication of all kinds..."[3] Even the print media, while structurally open, are economically closed to all but the wealthiest of individuals. The decentralized and open nature of the Internet supports a growing diversity of political messages. Campaigns, political action committees, and news organizations do not dominate the production and distribution of messages online. For every "official" candidate Web site, there are hundreds of "unofficial" sites speaking about the candidates' views and advocating their election or defeat.

-- Inexpensive

The campaign finance law reflects the economics of the mass media, where speaking effectively is expensive and those with extensive resources can literally outbid less well financed interests for the right to speak. In contrast, on the Internet, "talk is cheap." The low economic barriers to accessing the Internet

---

[3] 521 at 870, 886.

allow it to sustain a level of speech by and among individuals and loosely organized groups unparalleled in other media. It is the first electronic medium to offer every individual the possibility of being a publisher.

Email, Web sites, and other online forums offer a method of disseminating opinions and messages nearly devoid of incremental costs -- particularly when compared to other means of communicating to the public. Free email accounts and public Internet access at libraries and other public places allow individuals to engage in virtually free speech. Armed with an email account and using any one of thousands of "listserves," an individual can send a mass emailing to hundreds of thousands of individuals with little expense. Increasing numbers of Internet service providers and portals offer free "hosting" and provide tools for Web site creation as part of their subscriber package, enabling individuals to create Web sites practically free of charge. Even where an Internet account costs money, the incremental cost associated with the creation of a Web page is negligible.

While many individuals purchase their own computer and subscribe to a fee-based phone line and purchase Internet access from an Internet Service Provider, few of these individuals purchase these services for the purpose of influencing elections. Rather, as computers and Internet access are integrated into society, individuals increasingly will use them as they have phones, friendships and front yards to influence the outcomes of elections.

-- **User-controlled and interactive**

Unlike television and radio, which offer individuals little opportunity to make decisions about what information they receive, the Internet is a user-controlled medium, where individuals can choose the information that they come in contact with. On the Internet, each individual is able to seek out information of interest rather than being served a fixed plate of information.

In turn, candidates, like all online content providers, are able to provide, and are encouraged by the medium to offer, a wider range of information than feasible in print, radio, or television. Compared to other media, the Internet presents few, if any, economic disincentives to publishing more information. Unlike print where costs are associated with the materials of printing and the distribution of additional copies, or television where each 30-second segment bears a price tag, the cost of publishing additional "pages" or words is nominal.

The user-controlled nature of the Internet combined with the removal of economic barriers to making additional information available contribute to the growing abundance of information from both traditional and non-traditional sources.

Unlike the one-way transmission capacity typical of radio and television, the Internet is bi-directional in nature. Individuals can speak as well as listen.

The interactivity of the Internet alters the behavior of speakers. The brief one-way transmissions typical of election-related speech on radio and television lend themselves to the repetition of sound bites. The public is unable to ask for more information, the candidates find it expensive to provide more information, and opponents are unable to respond or comment. In contrast, the bi-directional nature of the Internet allows individuals to review a candidate's full policy statements, to compare them easily with the statements of other candidates, to respond and ask follow-up questions, and to challenge the candidate to further expand or reconsider their positions.

-- **Global**

The Internet is a global medium. It allows communication and interaction on a global scale. Web sites outside a country's boundaries are as accessible as those within. The Internet allows information, including political information, to flow quickly and seamlessly from one nation to the next without passing through checkpoints. The global nature of the Internet raises serious questions about the effectiveness of restrictions on expression and troubling issues for those charged with enforcement.[4]

B. Assumptions about campaign speech that influenced the structure and application of campaign finance law are inconsistent with campaign speech on the Internet

Existing campaign finance law is based on several assumptions that reflect the nature of traditional mass media. Because the characteristics of traditional mass media have so deeply influenced interpretation of the campaign finance law, many traditional interpretations of FECA should not apply to the speech enabled by the Internet's vastly different architecture.

First and foremost, FECA assumes that speech is expensive and that therefore money inextricably determines the amount and impact of political speech. In contrast, the Internet greatly reduces the cost of speech. Because the initial startup costs of becoming a speaker are relatively low and, once the investment is made, the difference between communicating to a single individual and communicating to masses of individuals is incremental, the effect of money on message creation and dissemination is vastly diminished in the online environment.

---

[4] For example, two Web sites, run by professors in the United Kingdom, contain links to candidates in our upcoming presidential election. There are certainly other sites run by foreigners that contain express advocacy.
http://www.dcs.warwick.ac.uk/people/academic/paul.goldberg/misc.html
http://www.public.iastate.edu/~lavery/

In addition, the campaign finance law assumes that the content of political speech (at least the political speech that matters) will be controlled by a relatively small set of entities created to influence elections. The law has assumed that there is a distinction between speakers and listeners, that the speakers will be the candidates (and their committees and parties), and that most citizens will participate in the campaign process not by speaking but by contributing money. Under this traditional scenario, to the extent that individuals become involved in the political process as "volunteers," it has been assumed they will not be speaking, but rather will be disseminating material (mainly printed material) produced by the campaign. Consequently, the FECA exempts the value of services by "volunteers," on the assumption that volunteers will not be speakers. On the Internet, in contrast, anybody can be a speaker. A "volunteer" can create a Web site as good as the campaign webmaster's. A volunteer on a well-subscribed list or chatroom or a frequently visited newsgroup can reach thousands of potential voters.

There are other differences between the traditional mass media and the Internet, one having to do with the role of advertising. Television and radio work exclusively on the advertising model: advertisements pay for the content. By and large, on television and radio the content is not political in nature. Most content providers on radio and television are studiously apolitical in their programming. To the extent there is content regarding politics, it is in the form of news, which is exempt from FECA. By and large, on television and radio, the only way that political speech is broadcast outside of the news is in the form of very expensive paid political advertisements.

On the Internet, the distinctions between content, news and advertisement are very different. There is a great deal of political content not supported by any advertising. On the Internet, most political content is not in the form of paid advertisements; it is in the form of freestanding Web pages. On the Internet, there is no economic disincentive for political content. Today, on the Internet candidates do not spend large sums of money on paid political advertisements supporting the (sports, news and entertainment) content of others. To the extent that candidates "advertise" on the Internet, they do it the way everybody else does, with banner ads that seek to lure viewers to the freestanding content at the candidate's Web site. Rather than purchasing the opportunity to reach a practically guaranteed set of eyeballs or ears from a limited number of gatekeepers -- the model of print and broadcast -- Internet speakers must develop other strategies to attract users to their information. Today, a small portion of the traffic to a political Web site may be generated by banner ads, but the majority of the traffic to the site will be generated by unpaid hyperlinks provided at other Web sites, search engines, portals, and individuals.

While future changes to the architecture and economics of the Internet could change the cost of speech and limit the diversity of speakers, today, speech on the Internet is robust, diverse, and inexpensive.

### C.	The Internet is Used for Political Speech in Ways Quite Unlike the Regulated Advertising of the Traditional Media

In addition to broadening the number and diversity of speakers, the Internet creates opportunities for new forms of speech. Real-time dialogues can be hosted, creating a parallel to the town hall meeting without the time and expense. Conversations can be held outside of real-time, as postings on Web sites form "threaded" discussions on specific topics, which can be archived and returned to at any time.[5] From their virtual platforms, individuals and organizations are publishing newsletters,[6] voters' guides[7] and other election-related materials; creating dynamic forums that support issue-based organizing, interactive discussions, and political advocacy;[8] and registering voters. To the

---

[5] On January 3, 2000, a search of "egroups.com," which provides a forum for threaded discussions by self-selected, dynamic, communities of interest, found: 728 messages containing the words "Bush" and "2000;" 643 messages containing the words "Gore" and "2000;" 524 messages containing the words "Bradley" and "2000;" 228 messages containing the words "McCain" and "2000;" 72 messages containing the words "Alan Keyes" and "2000;" 25 messages containing the words "Orrin Hatch" and "2000;" and, 260 messages containing the words "Forbes" and "2000." http://www.egroups.com (See Attachment B.)

[6] For example, the Web site Christian News Today offers "news" and "editorials" containing various discussions of candidates, but is generally issue-focused. http://members.aol.com/_ht_a/kamsnews/book36.htm

[7] See Jeff Rushing's personal site, a "private citizen, voter guide on Republican candidates -- which one can defeat Gore or Bradley." http://www.geocities.com/Athens/Styx/5483/2000election.html

[8] For a range of examples see: http://members.aol.com/vetschoice/ag2000.htm Veterans For Al Gore 2000. "Paid for by private citizen American veterans." Appears to be unaffiliated. States it is a collaborative effort, jointly funded by private citizens.

http://issues2000.org
Site states it is a nonpartisan effort to educate voters. States it is a not-for-profit, but also says donations are not tax-deductible. Provides information on candidates' positions on various issues.

http://www.netizensforbradley.org/
The Unofficial Bill Bradley for President Grassroots Network. Disclaimer stating names of creators and non-affiliation with campaign. Email lists established for all states on egroups.

http://www.sas.upenn.edu/~pruffini/bush2000.htm
Bush 2000 Network. Grass roots effort begun by Patrick Ruffini, a writer and student at the University of Pennsylvania. Began before Bush announced his candidacy. States it

political buttons and bumper stickers common offline (the sporting of which is unregulated by the FEC), individuals can append to their email signature lines messages endorsing or opposing candidates, perhaps with a link to the candidate's Web site.

Ironically, many Web sites containing express advocacy, particularly those created by individuals, are rarely visited by the general public.[9] It is increasingly common for individuals to have Web sites that combine the personal and the political.[10] Called "home pages," these sites may contain photos of the family vacation, contact information for a personal business, and information about the individual's hobbies, opinions, and sensibilities. As the campaign season grows near, more and more of these sites will sport virtual "signs" endorsing or opposing one or more candidates. These sites are not at all similar to paid advertisements. They are clearly messages about elections and they may sway some voters, but the look and feel of such sites is far from that of a newspaper or television advertisement.

Web rings, a growing phenomenon, allow like-minded individuals to network their Web sites through the creation of a common logo and system for linking to and listing Web participants. Today, the Webrings Web site indicates an enormous list of rings dedicated to election-related activities. (See Attachment C.) Likewise, web services such as E-groups and E-circles host hundreds of politically oriented discussions. (See Attachment B.) While some may be "official organizations," the majority are likely to be independent of the campaigns.

---

is not affiliated with the campaign. Provides news on Bush, and states that Bush 2000 email lists are being established.

[9] For example, many of the 3,411 member pages found at Tripod (a service that allows individuals to create homepages) containing the last name of a presidential candidate and "2000" are unlikely to receive a high number of visitors.

[10] For example, these Web sites each combine express advocacy with other personal views and information:
http://members.aol.com/_ht_a/atoucf/myhomepage/index.html
"Vinnie's Homepage." Contains, a rant about democrats and republicans and a "vote for Bush" line.

http://hometown.aol.com/dukenixon/dukenixon.htm
"Duke's Political Ranting: All Republican, All the time." Vote for Bush message. Also contains an online poll and issue specific information. Is linked to his general home page containing a variety of information.

http://members.tripod.com/~TheCosmicDivide/bush.html#partied
Web site criticizing Bush and containing other information.

Other Web sites function more as meeting places than billboards. While they post information supporting or criticizing a candidate, the sites' primary purpose is to provide a meeting place and forum for discussion for individuals interested in electing or defeating a specific candidate.[11] Such sites allow individuals to exchange information, organize, and discuss around a specific candidate or issue. The site may contain a mailing list, a method of posting information to the site itself, and other avenues of communication amongst interested visitors. The goal of such sites is to attract and organize like-minded individuals -- if the site's messages influence the general public, it is a side benefit. In general, these sites are used as a communication tool where "members" can share information and pool resources. Unlike the typical "home page," these sites are often a collective effort. In some instances, multiple individuals may alter the content displayed to visitors.

At this time, it is certain that the majority of political Web sites do not function like advertisements or other statements to the general public in traditional media.

On the Internet, no one is bombarded by unwanted political speech in the way that campaign ads can blanket the radio and TV. So Internet speech, while publicly available, should be treated differently. While interested individuals can find these sites through search engines --- the rough equivalent of telephone directories -- and reciprocal hyperlinks from other sympathetic sites, few, if any, of these sites use banner advertisements, unsolicited email messages, or other Internet advertising methods to place their message before the public. Unlike mass media where general public statements assault the public through the airwaves and television advertisements, Web sites are rarely thrust upon the public. Web sites survive because interested people seek them out, find the message worth consideration or adherence and pass the site's address (URL) along to others either through hyperlinks or email messages.

D. Characteristics of the Internet naturally promote cleaner, more informed elections without FEC intervention

The goals of campaign finance regulation would be best achieved by **not** regulating the individual, grass-roots campaign and election-related activity on the Internet:

> -- **Reducing the impact of money during campaigns and preventing the corruption or undue influence that stems from the demands of fundraising**

---

[11] These sites are excellent examples of organizing Web sites:
http://www.netizensforbradley.org/
http://www.sas.upenn.edu/~pruffini/bush2000.htm

Supporters of campaign finance restrictions argue that the role of money in politics fosters inequality in our democratic system. FECA reflects the belief that wealthy individuals and corporations and well-financed political action groups thwart the one person, one vote principle. The stated goal of FECA was to "broaden the diversity of groups that can have an input on the election process" and to "return our electoral process to the people." Election law supporters argue that large contributors are able to buy influence with legislators. A central purpose stated by the drafters of FECA was to "avoid corruption" and "reduce the corrupting influence of big money in Federal elections."

The Internet reduces the importance of money. It is an inherently equalizing force for non-candidates and minor candidates to participate in campaign discussions in ways previously reserved to well-funded candidates. In 1998, 64% of major-party challengers and non-incumbents running for the U.S. House, Senate, and Governorships had campaign Web sites, whereas only 28% of incumbents did.[12] The Internet empowers all users with the ability to speak to a large audience. A single wired individual can be powerful: one man organized over 100 campus protests against the Republican Party's Contract with America from his basement computer.[13]

Much of the speech enabled by the Web is extremely inexpensive. If the sunk costs of computer equipment are removed from the calculation -- as we believe they should be in all but a narrow class -- nearly every Web site created and maintained by an individual, or a loosely affiliated group of individuals, is well under the limits set for contributions and independent expenditures.

--   **Improving the quality of electoral debate**

The dominance of television is said to degrade the quality of election-related information available to citizens and thereby to decrease informed voting. Online, voters can easily check distorted candidate or organization statements. A search for a candidate name is sure to deliver not only the candidate's views on an issue but critiques and criticisms of the candidate's position and other relevant information.[14] Through linking and searching, opposing points of view and responses to a candidate's claims will be simultaneously available to individuals. Special interest groups can and will spend large sums on Internet

---

[12] The Democracy Online Census of Campaign Web sites (1998). http://www.democracyonline.org

[13] Oram, Jon, "Will the Real Candidate Please Stand Up?: Political Parody on the Internet," Journal of Intellectual Property Law, Spring 1998.

[14] For example, typing in "Bush" one might find the famous Bush parody site, http://www.gwbush.com/, A site containing random references to Bush within a larger debate about an issue such as http://issues2000.org , and the official Bush Web site.

political efforts, but individuals and smaller groups can inexpensively build Web sites responding to or critiquing candidate and interest group statements.[15]

-- Ensuring competitive elections

Supporters of campaign finance restrictions and other reforms point out that most campaigns are not truly competitive, most often because incumbents have a clear advantage. The Internet offers a new opportunity to challengers. As noted before challengers are making use of the Web. The Democracy Online Project found a strong correlation between the competitiveness of a race and the likelihood that one or both candidate had Web sites. Clearly, candidates already knew by the last election cycle that the Internet enhances competition.

The Jesse Ventura campaign is frequently cited as the leading example of how an outsider used the Internet to overcome the advantage of money and traditional organization: "An independent with no party structure or endorsements, all [Ventura] had was fame, blunt-spoken ideas — and the Net. For months Ventura had no physical 'headquarters,' just an ever-growing e-mail list. Two thirds of his fund-raising pledges arrived via the Internet. His final, three-day, get-out-the-vote bus trip was organized by e-mail. Ventura's site never was fancy. No elaborate graphics. It was a simple, text-based community of Ventura fans. The network generated a surge at the end, especially among young, new voters — an age group, not coincidentally, that grew up online. He won half the under-30 vote in a three-way race. 'The Internet didn't win it for us,' says Ventura Webmaster Phil Madsen, 'but we couldn't have won without it.'"[16]

II.   The FEC Should Refrain from Comprehensive Rulemaking until after the 2000 Election Cycle

The architectural and economic traits of the Internet de-emphasize the importance of money. The resulting quantitative and qualitative changes in campaign speech demand a reassessment of the application of campaign finance law to this new medium. But a full exploration of this new communications platform requires a deliberative process supported by a broad, inclusive factual record. Whether the Commission eventually needs to undertake

---

[15]For an example of a loosely organized effort by a group of individuals see: http://www.realchange.org
This site is run by a group of friends. The site states that it has no office, no staff, and no budget. The site states it is run by an "independent, nonpartisan political group," and says, "We do not support any candidate or party, and aim to attack all presidential candidates with brutal fairness."

[16] http://www.politicsonline.com/coverage/newsweek/index.html

such an effort, now is not the appropriate time. If the Commission were to embark on a rulemaking on the heels of the NOI, it would raise the likelihood of rules being issued, at the earliest, late in the election year, requiring organizations and individuals to review and revamp their practices mid-stream, while at the same time being based on an inadequate and evolving factual record. At this time, moreover, there is little, if any evidence that the Internet is being used in a fashion that undermines the goals of FECA.

For these reasons, we urge the Commission to delay any rulemaking on the application of FECA to the Internet until the conclusion of the 2000 election. This is not a request that the Commission sit idly during the election cycle. The 2000 election cycle will provide the Commission and interested parties an unequaled opportunity to study the Internet and understand who is using it and toward what ends.

To ensure that relevant parties, particularly the newly empowered individual citizen speakers, have the opportunity to participate in any FEC process that will directly impact upon their participation in elections, the Commission should engage in additional outreach efforts. Publication in the Federal Register is not sufficient to reach individual citizens.[17] The Commission should use its Web site and other online opportunities[18] to reach out to citizens, small groups of individuals engaged in organizing, and new non-traditional publishers. Some of the organizations signing this document would be pleased to have an opportunity to present to the Commission a demonstration of the variety of election-related speech and activity on the Internet. With a broader understanding of how individuals, campaigns, organizations, political action committees and candidates used the Internet during the 2000 cycle, the Commission will be well-positioned to hold hearings and, if warranted, pursue a rulemaking at this time next year. If, despite our urging, the Commission feels it must proceed, we urge that any new rules become effective after the 2000 election cycle.

---

[17] During the comment period, the Center for Democracy and Technology provided an interactive site that enabled average citizens to easily file comments. This involved reformatting and simplifying the Commission's questions to highlight those of concern to individuals, placing the questions in context through the provision of examples and factors to consider, and creating simple forms to both respond and submit replies. See http://www.cdt.org/speech/FECA.shtml

[18] The major portal Web sites such as Yahoo!, Lycos, and Excite; large Internet Service Providers such as Mindspring, Bell Atlantic, PSI Net, and AT&T Worldnet; and Online Service Providers such as America Online (AOL) and Prodigy provide excellent opportunities to reach out to individuals. The AOL feature "My Government" may provide a vehicle for reaching these new participants.

III.   **The Commission Should Create a Safe Harbor for Individuals and Make It Clear That, During the 2000 Election Cycle, It Will Proceed Cautiously With Respect To Corporations, Non-Profit Organizations and Other Entities Not Connected with Organized Parties, Candidates and PACs**

   A.   **Using the valuation rules, create a safe harbor for individuals**

At this point, the only action the Commission should initiate should be to clear the way for independent activities by individuals, i.e. activities that are not coordinated with a campaign. The Internet is changing individuals' experience of, and participation in elections and politics broadly defined. The Internet is a platform for informal, unorganized, grassroots political discussions of a breadth and variety rarely witnessed in the offline world. Much of the debate and discussion of candidates and issues is removed from candidate Web sites and control -- conducted instead by individuals and groups. No longer are individuals merely the supporters of campaign activity -- contributing money to enable others to develop and disperse messages, volunteering time to carry out tasks decreed by others, spreading messages crafted and controlled by the campaigns. Fueled by the architecture and economics of the Internet, a growing number of individuals are seizing the opportunity to craft and express their own messages about issues and elections, unite with other individuals to influence elections, and publicly question, criticize and support candidates.

The individuals who are engaged in this "mass participatory speech" are generally unaware that their activities could be subject to FEC regulation. Like the individuals who place "vote for" signs in their front yards, individuals placing virtual "vote for" signs on their "home pages" are unlikely to be aware that this activity is anything other than the highest form of constitutionally protected speech. In most cases, we believe that their assumption is correct: FECA should not cover the activities of individuals and loosely organized groups of individuals engaged in election-related activities. The Commission's advisory opinions have cast a chill on this burgeoning form of individual participation. We believe that by inappropriately suggesting that it will assign costs to such Internet speech, the Commission has broadened the scope of FECA to speech that should not fall within its scope.

Accordingly, we urge the Commission to establish a per se rule that there is no requirement to register or report unless an individual has direct out of pocket expenses that exceed $250 for speech which advocates the election or defeat of a candidate. Direct costs would not include any allocation for expenses, such as equipment purchases, ISP fees etc, unless the costs were incurred principally to advance or oppose a candidate.

As discussed above, individuals can speak effectively on the Internet without enormous resources. The incremental cost to the individual of sending

one email versus one thousand is near zero. Nor do individuals pay for the exposure of their Web site: whether a Web site is visited by ten individuals or one hundred, the cost of the message and the service is unlikely to change. Numerous "links" directing people to the site may appear at other Web sites free of charge, and frequently without the site creator's knowledge. In many cases, an individual's political message is within a larger communication that addresses multiple topics, further narrowing the cost, if any, of the particular campaign-related communication.

At this time, we believe the Commission should allow this experimentation in speech to continue unfettered. *The potential to encourage individual participation in the electoral process far outweighs the potential for such speakers to distort outcomes, unduly influence officials, or undermine other goals of the campaign finance law.*[19]

B.   **The Commission should take a cautious approach to online campaign-related activities during the 2000 election cycle by entities such as corporations, labor unions, educational entities, and non-profit entities, acting narrowly in response to advisory opinion requests and complaints and to redress clear violations of existing law.**

Corporations, labor organizations, and other non-affiliated organizations are all using the Internet. Many of these organizations are familiar with their obligations under the campaign law and we are not suggesting that they be allowed to use the Internet to make an end run around the law. Nevertheless, the architecture and economics of the Internet present new difficulties to those tasked with compliance. How do you map onto the Internet a law that turns on the precise ability to capture and determine the cost of distributing a message? How do you appropriately value Internet activities?

During this election cycle, non-affiliated organizations should be allowed to use their best judgment, supplemented by Commission advisory opinions where they are sought. Enforcement actions risk chilling new experiments in issue advocacy and non-partisan activities on the Internet. In particular, the Commission should be wary of complaints that would, if sustained, have the effect of silencing such efforts. At this time, it would be wise to encourage experimentation, coupled with these organizations' best efforts to stay within the goals of FECA. By allowing this experimentation to continue, the Commission will ensure that any new rules take full account of the variety of this new medium.

---

[19] On January 1, 2000, we conducted a brief search for the candidates names and "2000" at several locations on the Web. See Attachment D.

IV. Conclusion

It is clear that the Internet is altering speech. The changes in who can speak, how broad an audience they can reach, and at what cost have implications for the application of campaign finance law to the Internet. Faced with this shifting environment and strong evidence that regulation may prove more hazardous than staying its hand, we strongly urge the Commission to proceed cautiously during the 2000 cycle. The Internet appears to offer a unique opportunity to engage and empower the public in the electoral process. By delaying comprehensive rulemaking while clearing a space for individual advocacy, proceeding cautiously as to the online activities of corporations, labor unions and non-profit entities, and acting narrowly in response to advisory opinion requests and complaints and to redress clear violations of existing law during the 2000 cycle, the Commission will afford itself, Congress, interested parties, and the public the opportunity to gather the information necessary to identify the best method of achieving the goals of campaign finance reform in this revolutionary communications medium.

Respectfully submitted,

Deirdre Mulligan, Staff Counsel
Center for Democracy and Technology

Elliot M. Mincberg, Vice President and General Counsel
Lawrence S. Ottinger, Senior Staff Attorney
Alma C. Henderson, Staff Attorney
People For the American Way

Barry Steinhardt, Associate Director
American Civil Liberties Union

Paul M. Weyrich, National Chairman
Coalitions for America

Lisa Dean, Vice President for Technology Policy
Free Congress Foundation

Michael Cornfield, Associate Research Professor, Project Research Director
David Anderson , Associate Research Professor
For the Democracy Online Project of the George Washington University's
Graduate School of Political Management

Tom DeWeese, President
The American Policy Center

Steven Clift, Board Chair

Minnesota E-Democracy

Kim Alexander
California Voter Foundation

Patricia Owens
Wisconsin State Sovereignty Coalition

Robbin Stewart, General Counsel
Libertarian Party of Indiana

John J. Adams, Member, Board of Directors
H.A.R.T.land Inc.(Zumbro Watershed Chapter)

Bobbie Patray, President
Tennessee Eagle Forum

David F. Salisbury
Sutherland Institute

Jonah Seiger, Principal
Shabbir Safdar, Principal
mindshare Internet Campaigns, LLC

Phil Noble, Member, Board of Directors
PoliticsOnline

Robert K. Arena, Jr., Principal
Presage, Inc.

R.J. Tavel, J.D., Managing Partner,
Tavel & Stewart

Attachments enclosed.

ATTACHMENT A

Information about organizations and individual signatories:

- The Center for Democracy and Technology is a non-profit, non-partisan public interest organization dedicated to developing and implementing public policies to advance civil liberties and democratic values on the Internet. From its inception in January 1995, the Center has played a leading role in policy debates on free expression on the Internet. We view the Commission's NOI through the experience of the legislative process that resulted in Congress' first attempt to regulate content on the Internet – the unconstitutional Communications Decency Act (CDA). As the coordinator of the Citizens Internet Empowerment Coalition (CEIC), CDT joined with the American Library Association, and others, to rally civil liberties organizations, the library and publishing communities, Internet service providers, and individual users of the Internet to challenge the CDA.

- People For the American Way ("People For") is a nonpartisan, citizens organization with more than 300,000 members nationwide, established to promote and protect civil and constitutional rights. People For has been actively involved in efforts to increase voter registration and citizen participation in the political process and is interested in protecting the integrity of our participatory democracy in a manner consistent with First Amendment values and principles.

- The ACLU is one of the nation's premier defenders of First Amendment Rights of Free Speech and Association. The ACLU has a long interest in the effect of the campaign finance laws on speech and has litigated numerous cases on the subject. The ACLU has also championed the free speech rights of Internet users and brought the landmark case of Reno v. ACLU.

- The Free Congress Foundation a non-partisan research and education foundation dedicated to conservative governance, traditional values, and institutional reform. Issue priorities include judicial activism, technology policy, and cultural conservatism. The Center for Technology Policy is a project of the Free Congress Foundation, a non-profit research and education foundation. The Center's focus is on technology policy in the area of privacy and our Constitutional rights, specifically addressing national ID, medical databases, financial databases, the Internet, encryption and surveillance issues.

- The American Policy Center is a privately funded, nonprofit, tax-exempt grassroots action and education foundation dedicated to the promotion of free enterprise and limited government regulations over commerce and individuals.

- The George Washington University's Democracy Online Project promotes the development of online politics in a manner which upholds democratic

1

principles and values. It regards the FEC's regulation of campaigns as a crucial indicator of how well the U.S. electoral process, which is being transformed by the rise of online media, accommodates such essentials of democratic politics as free speech, universal access, government accountability, public deliberation, and social tolerance. Accordingly, the Project will continue to study and comment on the FEC's activities with respect to the Internet.

- The California Voter Foundation (CVF) is a nonprofit 501(c)3 organization advancing new technologies to improve democracy. Since 1994, CVF has published nonpartisan guides on the Internet to help California voters make more informed election choices. We do not take positions on any ballot issues, and we include all candidates -- major and minor party alike -- in our voter information resources. CVF also advocates for "digital sunlight" by promoting electronic filing and Internet disclosure of campaign finance data.

- Minnesota E-Democracy <http://www.e-democracy.org> is a nonpartisan citizen-based project, whose mission is to improve participation in democracy in Minnesota through the use of information networks.

- H.A.R.T.land, Hunting, Access, Recreation, Trespass is a very small property rights group in SE Minnesota.

- mindshare Internet Campaigns LLC is an online campaign strategies firm based in Washington DC. Mindshare specializes in helping non-profits, trade associations, and coalitions harness the unique power of the Internet to advance public policy objectives. Before starting mindshare Internet Campaigns in 1997, co-founders Jonah Seiger and Shabbir Safdar were leaders in the fight to defeat the Communications Decency Act. Both are recognized experts on the subject of the role of the Internet in the democratic process.

- PoliticsOnline provides online fundraising and Internet tools for politics.

- Robert K. Arena, Jr., Principal in Presage, Inc. (http://www.presageinc.com), was Director of Internet Strategy for Dole for President and Dole/Kemp '96. In 1997, he was responsible for Internet strategy for Governor Christie Whitman's reelection campaign. In 1998, he was responsible for Governor Pataki's 1998 reelection Internet strategy. Since then, he's been a consultant to the Republican National Committee and the Markle Foundation's Web White and Blue project.

- Tavel & Stewart is a public interest law firm, bringing individuals, "a whole new boutique of wonderful First Amendment litigation." [J. Scalia]

ATTACHMENT B

eGroups
.com

The Easiest Way for Groups to Communicate

eGroups.com

eGroups.com provides a gathering place on the Internet for your group to send and receive emails, schedule meetings, share files and photos, or have private group chats. Any kind of group - fan clubs, alumni groups, sports teams, families, or friends - can use eGroups.com. Whether you're planning a big event or trying to keep in touch with faraway family, use eGroups.com to make your group's communication as simple as possible.

Every group features these great tools:

Group Email
Fast and easy email lists:

- Send one email to your whole group by typing just one message
- Manage your group with complete control and flexibility
- Receive email or view a complete history of group messages on a Web bulletin board.

Group Calendar
Access your group calendar from anywhere:

- Schedule meetings and events
- Send automatic email reminders
- Overlay your personal and group calendars to see everything at once
- Use the Calendar or Polling functions to set up an online meeting

Group Document Vault
Store and share files securely:

- Share photos, MP3s, team rosters, class assignments or any other group document
- Add documents to the Vault with one click
- Keep or bookmark favorite Web sites
- Get anytime, anywhere access to your files

Group Chat and Talk
Talk to your group members for free:

- Use Talk as a free Internet voice telephone, even for long distance calls
- Talk to all your friends at once without paying a cent for three-way calling or conference calls
- Schedule a group chat in your private chat room, or just drop in to see who's there

Click here to start your group today!

eGroups.com

Responde.com

Browse Groups: Law & Government

[Search]

Top: Law & Government

Start a new group

Politics & Government features timely discussions, newsletters, and action alerts on every aspect of law, the military, activism around the world, and philosophies of governing. Get ready to debate.

Associations & Clubs *(188)*

City & Civic Issues@

Classes@

Conspiracies *(39)*

Cyberspace *(48)*

Drugs@

Enforcement & Police *(63)*

General Discussion *(58)*

Government Agencies & Services *(47)*

Guns & Weapons *(35)*

Issues & Causes@

Law & Legal Profession *(195)*

Law - Types of *(354)*

Legal Technology *(15)*

Military & Wars *(285)*

News & Publications *(65)*

Other *(19)*

Political Parties *(315)*

Political Philosophies *(175)*

Politicians *(31)*

Regional Discussion *(51)*

Safety & Emergency Services *(42)*

Voting & Electoral Reform@

World & Foreign Affairs *(121)*

eLections 2000 *(105)*

ATTACHMENT C

What is WebRing?

WebRing is the first, largest, and fastest-growing service of its kind on the Internet, providing one of the easiest ways for visitors to navigate the Web.

In each of its tens of thousands of Rings, Member web sites have banded together to form their sites into linked circles. Their purpose: to allow more visitors to reach them quickly and easily.

An extraordinary system servicing three primary World Wide Web groups: Visitors, Member sites and advertiser-merchants, WebRing remains entirely open and free of charge to both Visitors and Members. As a leading online navigation aid, WebRing is experiencing a growth rate of over 10% monthly. Daily page requests from visitors exceed 2,000,000; Member sites total over 1,300,000; Rings total over 80,000.

The WebRing system can support a nearly unlimited number of separate and distinct Rings across the Internet. This unique structure allows the creation and evolution of tens of thousands of different "web communities." Each Ring was started and is maintained by an individual website owner, it's RingMaster.

Through navigation links found most often at the bottom of Member pages, Visitors can travel all or any of the sites in a Ring. They can move through a Ring in either direction, go to the next or previous site, or list the next five sites in the Ring. They can jump to a random site in the Ring, or survey all the sites that make up the Ring.

The quickest way to find a Ring of interest is to visit WebRing's online Directory. There you can select a category, or use RingSearch to search for Rings across the entire system, then refine your search by searching within a Ring. If you can't find a Ring that suits your needs, you're free to start your own!

Operated by WebRing Inc. since August, 1997, WebRing was first created in June, 1995, by Sage Weil, launched in March, 1996, and moved onto its own server in September, 1996.

WebRing drew its initial inspiration from a similar structure called EUROPa (Expanding Unidirectional Ring of Pages). Michael at newdream.net helped with initial graphic design. In August, 1995 Jerry Hierro suggested a centralized CGI program to run the system.

The first new Ring created was the ESLoop. By the beginning of 1997, there were over 1,000 Rings on the system, and by May of that year 10,000. By April, 1998, there were over 40,000 Rings on WebRing.

WebRing has been extensively covered by the news media, with stories appearing in: CNN-TV, CNET-TV, TAIPAN, Business Week, Investors' Business Daily, InfoWorld, WebWeek and Public Radio.

**Search for term
"DEMOCRAT"**

WebRing Search Results

Your search turned up the rings listed below. You can also find
rings through RingWorld, the WebRing Directory!

Narrow the results of your search by checking the "All words" choice or the "Exact
Phrase" choice and clicking the Search button. Expand the results by checking the "Any
Word" choice.

democrat   [Search]

Search for: ○ Any Word ● All Words ○ Exact Phrase
Include: ☐ Full Words Only ☑ Ring Descriptions ☑ Ring Names & Keywords

Ratings [All ▾] **Minimum Ring Size** [0 ▾]

Found 41 rings -- 1 - 25 -- Next--

Score Results

100 Blue Dog **Democrat** Web Ring (bluedogdemocrat) -- 1 sites -- List Home Random Search Ring
Keywords: Blue Dog **Democrat** Peterson Ford Tanner Phelps Minge Sanchez Bishop Tauscher Lipinski John
moderate conservative reform
-- Description: This is a webring for "Blue Dog" Democrats. A "Blue Dog" is a moderate-to-conservative
Democrat who sees the real issues and debates being "choked blue" by the extreme factions of both major
parties. We seek to support moderate and conservative Democrats in primary elections to further the goal of a
sensical and balanced approach to making laws that affect all of us.

71 Happy Days Are Here Again **Democratic** Web Ring (democrat) -- 21 sites -- List Home Random
Search Ring
Keywords: **democrats** politics candidates democratic elections **democrat** campaigns political donkey DNC
clinton gore 1998 2000 USA congress **democrats**
-- Description: Web ring for **Democrats!** Democratic candidates, organizations, issue campaigns, and activist
should join

71 **Democrats** Online WebRing (democrats) — 21 sites -- List Home Random Search Ring
Keywords: **democrat democrats** liberal liberals politics party election elections candidates candidate
organizations
— Description: Webring linking Democrats online. This ring is for **Democratic** Party sites, candidates, and all
sites that relate to the **Democratic** Party and liberal thinking.

43 The Ring of Liberals (libering) — 28 sites -- List Home Random Search Ring
Keywords: liberal **democrat** communist socialist leftist
-- Description: The *new* Ring of Liberals is a webring dedicated to joining together all sites of democratic,
liberal, or leftist nature. All sites with these types of content are encouraged to join.

42 No More Jesse Helms. The Ring. (helms) -- 17 sites -- List Home Random Search Ring
Keywords: Jesse Helms North Carolina free speech Politics Republican **democrat democrats democratic**
-- Description: A ring devoted to no more Jesse Helms in office, left wing ideas, and free speech. Come join us in
showing your support for ridding ourselves of this great embarrassment to North Carolina and the USA and show
your support for democratic ideas.

38 The Progressive Politics WebRing (prog) -- 81 sites -- List Home Random Search Ring
Keywords: political party parties politics liberal **democrat** progressive
-- Description: Web ring of Politically Progressive sites. Official party organizations, party clubs, unofficial sites, advocacy and lobby groups, are among those who might join this ring.

37 We Will Remember in 2000 Ring (wwremember) -- 63 sites -- List Home Random Search Ring
Keywords: liberal **democrat** democratic elections campaigns bill clinton ken starr republicans right wing left wing conservative political politics
-- Description: A ring for all the people who will remember what the republicans have done and will cast their vote accordingly in 2000. Your site need not be entirely based on this, just a link..a muse..a thought will do. Join now!

37 The Liberal Ring (liberal) -- 63 sites -- List Home Random Search Ring
Keywords: liberal politics conservative liberalism political government **democratic democrat** republican left wing right leftist socialist socialism
-- Description: A ring of sites for the Liberal minded. Any subject dealt with in a Liberal manner (as opposed to conservative) is fine and will be accepted.

36 The Political Science and Politics Webring (polisci) – 60 sites -- List Home Random Search Ring
Keywords: politics policy political science parties Republican **Democrat**
-- Description: This webring is dedicated to politics, political science, research in policy and public policy, or just plain party affiliated sites. If your site has politics in it, this ring is for you. Racist sites ARE NOT ACCEPTABLE However, international sites (as long as they are in English) are acceptable...

36 Supporters of Bill Bradley (billbradley) -- 47 sites -- List Home Random Search Ring
Keywords: politics bradley election government **democrat**
-- Description: A webring for people who will vote for Bill Bradley in 2000. You don't need a web page about Bradley; just be willing to add the ring code and graphic to your page.

34 Cafe Progressive's Spirit Circle (revspirit) -- 23 sites -- List Home Random Search Ring
Keywords: multiculturalism education politics culture radical alternative anti-racist k12 socialism feminism social justice oppression liberal left leftist **democrat**
-- Description: A cybercircle of progressive individuals and organizations on the web. Member sites actively stand for equal opportunity for all, an end to individual and institutionalized racism, sexism, ageism, elitism, homophobia, exploitation, environmental destruction, and discrimination against the "dis"abled. We don't have to be doing the same thing, but we all should be doing something.

34 Politics 2000 Web Ring (politics2000) -- 20 sites -- List Home Random Search Ring
Keywords: politics election 2000 candidates vote voting politician issues **democrat** republican libertarian gore president
-- Description: Politics 2000 is a year 2000 election ring dedicated to linking sites with information that voters would be interested in. These sites include major political sites and people with interesting political positions on issues. I maintain only high quality members in this ring. If you want to be part of a ring of quality political sites with a variety of positions run by a ringmaster with a proven record, this ring is for you.

34 Campaign '98 Web Ring (campaign98) -- 12 sites -- List Home Random Search Ring
Keywords: elections campaigns politics usa **democrat** republican libetarian third-party candidates vote policy congress state senate representative city counsel president grass-roots
-- Description: The Campaign 98 webring is a resource to get you EXPOSURE, VISIBILITY for you & Your MESSAGE to America's Voter's.

33 Ring Of Iowa Political Sites (roips) -- 8 sites -- List Home Random Search Ring
Keywords: Politics Republican **Democrat** Iowa Reform Independant
-- Description: Web sites of political groups and parties in Iowa.

33 The Republican DRAFT for 2000 Webring (rep2k) -- 7 sites -- List Home Random Search Ring
Keywords: Republican Conservative Politics Whitehouse 2000 Presidential Race President Campaign **Democrat** Liberal GOP POTUS right wing
-- Description: A ring of unofficial sites dedicated to drafting major Republicans into the 2000 presidential race.

33 My hero, Joe (mccarthy) -- 4 sites -- List Home Random Search Ring
Keywords: clinton DNC republican GOP **democrat** humor monica lewinsky newt gingrich
-- Description: "I have in my hand 57 cases of individuals who would appear to be either card-carrying members or certainly loyal to the Communist Party, but who nevertheless are still helping to shape our foreign policy."

33 The Essential Book Circle (cbooks) -- 4 sites -- List Home Random Search Ring
Keywords: books history politics conservative liberal fiction government current events author authors social environment guns republican **democrat** philosophy
-- Description: A circle of authors presenting books on current topics.

33 The Stop Buchanan Webring (byepatbye) – 2 sites -- List Home Random Search Ring
Keywords: Anti Pat Buchanan liberal conservative Republican Reform **Democrat** liberal politics discussion commentator
-- Description: This is a webring dealing with the biggest embarrassment to mainstream conservatism, commentator/racist/anti-Semite/historical revisionist Pat Buchanan. This is a webring for those of us who just wish he'd "GO PAT GO" AWAY. Throughout this webring you can find conservatives, moderates, and liberals alike who believe that Buchanan's 1940's school of thought doesn't apply to modern America.

33 The Mainstream Republican Webring (mainstreamgop) -- 1 sites -- List Home Random Search Ring
Keywords: moderate conservative Republican election politic liberal anti-**Democrat** anti-Gore mainstream viewpoint George Bush Al Gore Tennessee Sundquist Thompson Frist Memphis
-- Description: A group of websites for the large number of centrist or moderate Republicans who seek to limit the influence of the extreme fringes of both the right and the left, to promote the Republican Party to centrist and moderate voters, and to encourage party activists to get involved in the Republican Party to address the concerns of mainstream Americans and not just those of the far right.

28 The Liberal **Democrats** Web-Ring (libdem) -- 30 sites -- List Home Random Search Ring
Keywords: Liberal **Democrats** UK politics Parliment PR Proportional Representation Liberalism Democracy Paddy Ashdown Fair Votes Radical Radicalism
-- Description: The UK Liberal **Democrats** Web-Ring, visit web-pages set up by Local parties, individual LibDems, and any-one else interested the UK Liberal **Democrats**.

22 VVD WebRing (vvdwebring) -- 35 sites -- List Home Random Search Ring
Keywords: vvd woerden volkspartij vrijheid **democratie** politiek liberaal gemeente provincie raad staten generaal tweede eerste kamer fractie bestuur
-- Description: De officiele WebRing van de Volkspartij voor Vrijheid en **Democratie**.

22 Micronation and Virtual Nation Webring (micronations) -- 34 sites -- List Home Random Search Ring
Keywords: Micronation Virtual Nations Government Monarchy Oligarchy Republican **Democratic**
-- Description: This is ring that is intended to link all the monarchic, republican, oligarchic, democratic, and other for of governed micronations together, in an easy to access index.

20 Sinistra Giovanile (sg) -- 5 sites -- List Home Random Search Ring
Keywords: sinistra giovanile iusy ecosy **democratici** di sinistra ds sg
-- Description: Webring della Sinistra Giovanile, l'organizzazione giovanile dei **Democratici** di Sinistra, che fa parte della IUSY e dell'ECOSY. I circoli, le federazioni e le varie strutture Sg on-line per conoscerne le idee, i progetti, le iniziative.

16 **Democratic** Simming Foundation Webring (dsfsim) – 5 sites -- List Home Random Search Ring
Keywords: DSF StarTrek Simming RPG RPGs Trek Dominion Romulans Federation
-- Description: The **Democratic** Simming Foundation Web Ring has been designed to link all DSF and affiliated sites together.

15 Struggle,Solidarity,Socialism (cwiws) -- 103 sites -- List Home Random Search Ring
Keywords: socialism struggle solidarity marx englcivis lenin trotsky political election party workers education organisation civil rights leftwing
— Description: This web ring is for socialist web pages.It is for those who are intereted in fighting for **democratic** world socialism.It is for those who agree with the ideas of Marx, Engles,Lenin and Trotsky.

Found 41 rings – 1 - 25 --Next--

[Return to RingWorld]

WebRing Search Results

Your search turned up the rings listed below. You can also find rings through RingWorld, the WebRing Directory!

Narrow the results of your search by checking the "All words" choice or the "Exact Phrase" choice and clicking the Search button. Expand the results by checking the "Any Word" choice.

democrat

Search for: ○ Any Word ● All Words ○ Exact Phrase
Include: ☐ Full Words Only ☑ Ring Descriptions ☑ Ring Names & Keywords

Ratings |All| Minimum Ring Size |0|

Found 41 rings -- 26 - 41 --Prev--

Score Results

14 **image-i-nation** (imagecomics) -- 82 sites -- List Home Random Search Ring
Keywords: image comics top cow wildstorm avalon Todd McFarlane Jim Lee Silverline Spawn Gen13 Silvestri Witchblade
-- Description: This ring is devoted to sites about Image Comics. It's the most democratic ring on the web. We also have an MB.

14 **DDR Web Ring** (ddrnostalgie) -- 37 sites -- List Home Random Search Ring
Keywords: ddr gdr Deutsche Demokratische Republik Pioniere junger Th lmannpionier Thaelmannpionier FDJ deutsch deutschland germany german democratic republic demonstration sed nostalgie glossar mopeds honecker lieder songs ossi stasi staatssicherheit mauer simson wartburg trabant geld money mark fdgb zeitung zeitungen zeitschriften ampelm nnchen ampelmaennchen
-- Description: Seiten über und um die DDR! - Sites about the GDR

12 **McCain2000 Webring** (mccain2000) -- 12 sites -- List Home Random Search Ring
Keywords: Republicans John McCain McCain2000 Gore Bush2000 EDole2000 presidential campaign finance reform Conservatives Moderates Liberals Democrats Libertarians Independents POW MIA GOP elections
-- Description: Welcome to the McCain2000 Webring - This ring is dedicated to the successful election of Arizona Senator John McCain as President in the 2000 elections.

12 **Politic Talk** (politctalk) -- 12 sites -- List Home Random Search Ring
Keywords: politics talk news Republicans Democrats RNC DNC current
-- Description: To be in the webring you must only have some political content on it. Your site must not have a lot of swearing, or ANY sexism or racism. You can be from any party. And no text from the Starr report on the front page!

12 **The Webring Of The Lost Sojourner** (sojournal) -- 8 sites -- List Home Random Search Ring
Keywords: open broad psychological madness total freedom democratic poetic spiritual hippy
-- Description: The Ring dives into the interestes that people hear, see and feel... These pages aren't just regular pages, they are ones from individuals who express themselves spiritually, mentally or... anyway they can. This may be thru music, poetry, arts of any kind. Whatever it may be it is always true and sincere

12 The Anti-Republican Webring (deep6) -- 7 sites -- List Home Random Search Ring
Keywords: republican democrate conservative liberal clinton starr ken starr impeach politics progressive congress
-- Description: Do you think the Republican Party has gone to far? You're obviously not alone! Do something about it! Add your site to the Anti- Republican Webring. The Republicans have had their say, it's time for liberals to do the same.

12 Ring of Liberals (libring) -- 6 sites -- List Home Random Search Ring
Keywords: civil liberties rights democrats liberals environment gilson welfare Pennsylvania communism socialism capitalism anti
-- Description: The Ring of Liberals is a ring of sites dedicated to great liberal or leftist ideas. The sites in the Ring of Liberals give opinions, commentary, and facts concerning leftist topics, ranging from communism and socialism to moderate liberalism. Join or visit if you have an open mind! .

12 The Political Action Committee Web Ring (pacs) -- 5 sites -- List Home Random Search Ring
Keywords: political fundraising registered pac anti-democratic pro-republican
-- Description: The PAC Web ring is an association of web sites focusing on political action in the United States.

10 Cold War Militaria Collectors (cwmc) -- 10 sites -- List Home Random Search Ring
Keywords: Cold War Militaria USSR DDR Medals Orders Awards Rank Insignia Uniforms Badges Visored Hats
-- Description: The ring is designed to generate interest in Cold War Militaria in the hope that information can be shared. It includes but its not limited to items from the former Soviet Union, and German Democratic Republic. It specializes in websites that display pictures of Uniforms, Awards, Medals ect. and organizational charts of military units.

10 N.E.D.A. Web Ring (nedaring) -- 7 sites -- List Home Random Search Ring
Keywords: Dogs NEDA companions animals
-- Description: Contains websites of members belonging to the National Esquimaux Dog Association who own this rare and unique breed of dog. Our association is non-profit, democratic organization and has an international membership.

9 Ring of Effusion (roe) -- 6 sites -- List Home Random Search Ring
Keywords: photography digital art painting artists poetry prose social commentary graphic design
-- Description: The Ring of Effusion is a webring for all types of artistic endeavors, photography, poetry, graphical & digital art, animated arts with sound....variety is encouraged. Originality is the key. A democratic ring......all members have a say. Maximum membership 10-12.

9 Ciberplai (ciberplai) -- 6 sites -- List Home Random Search Ring
Keywords: Romania sincronizarea cu Vestul actiune individuala si liber asumata societatea informatiei member-friendly society Romanian evolution individuals horizontal structure
-- Description: The Ciberplai Ring brings together individuals who whish to synchronize Romanian society with the post-industrial democracies. Salba Ciberplai aduna românii din satul planetar care vor sa contribuie la sincronizarea Romaniei cu democratiile post-industriale. Esenta Ciberplaiului sta in actiunea individuala si liber asumata.

9 World Classified Ads (worldads) -- 2 sites -- List Home Random Search Ring
Keywords: free ads classified ads internet webmasters web promotion search engines webmasters web-sites freestuff freebies link exchange free links free-for-all links add a link add URL
-- Description: Classified ads are the way forward for democratic participation in the Web.All you need to join this ring is a free ads page.If you don't have a page visit the ring home,http://www.dfernando.freeserve.co.uk/classified.html to get one.No pornography or racism.

4 Northeast Tennessee Web Ring (n3e2t7) -- 0 sites -- http://www.etsu.net/students/democrats/webring.htm Search Ring
Keywords: East Tennessee Republican Democrat Western North Carolina College Democrats
-- Description: Web Ring Northeast Tennessee and Western North Carolina web sites.

4 DubyaSux (dubyasux) -- 0 sites -- http://www.angelfire.com/me3/DubyaSux Search Ring
Keywords: George W Bush Dubya Republican Democrat President
-- Description: Keep the Bush Family out of the WhiteHouse, they have done enough to ruin this country already!

2 Guerrilla Commie's (guerrillacommie) -- 0 sites -- http://homepages.go.com/cgi-bin/file_manager.cgi Search Ring
Keywords: Guerrilla Rage Commie Music korn Limp Bizkit Culture Irish Mexican Zapatista Politics Democrates Republicans Adult Women Unity Money Speech EVIL world
-- Description: My Web Ring is about freedom of speech and other topics in the world that have been ignored.

Found 41 rings -- 26 - 41 --Prev--

[Return to RingWorld]

Brought to you by WebRing Inc. and Yahoo! Inc.   © 1995-1999 WebRing Inc.   All Rights Reserved

Search for term
"Republican"

WebRing Search Results

Your search turned up the rings listed below. You can also find rings through RingWorld, the WebRing Directory!

Narrow the results of your search by checking the "All words" choice or the "Exact Phrase" choice and clicking the Search button. Expand the results by checking the "Any Word" choice.

> republican

Search for: ⊂ Any Word ⦿ All Words ⊂ Exact Phrase
Include: ☐ Full Words Only ☑ Ring Descriptions ☑ Ring Names & Keywords

Ratings | All | **Minimum Ring Size** | 0 |

Found 43 rings -- 1 - 25 -- Next--

Score Results

100 Ring Of Conservative Sites (conservative) -- 777 sites -- List Home Random Search Ring
Keywords: conservative politics Republican Libertarians Clinton political right-wing right
-- Description: Ring for politically conservative web sites. Right-leaning libertarians also acceptable.

97 The Anti-Republican Webring (deep6) -- 7 sites -- List Home Random Search Ring
Keywords: republican democrate conservative liberal clinton starr ken starr impeach politics progressive congress
-- Description: Do you think the Republican Party has gone to far? You're obviously not alone! Do something about it! Add your site to the Anti- Republican Webring. The Republicans have had their say, it's time for liberals to do the same.

96 The Mainstream Republican Webring (mainstreamgop) -- 1 sites -- List Home Random Search Ring
Keywords: moderate conservative Republican election politic liberal anti-Democrat anti-Gore mainstream viewpoint George Bush Al Gore Tennessee Sundquist Thompson Frist Memphis
-- Description: A group of websites for the large number of centrist or moderate Republicans who seek to limit the influence of the extreme fringes of both the right and the left, to promote the Republican Party to centrist and moderate voters, and to encourage party activists to get involved in the Republican Party to address the concerns of mainstream Americans and not just those of the far right.

96 The Republican's On-Line Web Ring (repubs) -- 1 sites -- List Home Random Search Ring
Keywords: Politics Republican Republicans Conservative Conservatives
-- Description: Republicans On-Line Web Ring is for Republican Web sites to join together to give our users access to other sites of thier interest.

80 Republican National Web Ring (rnwr) -- 65 sites -- List Home Random Search Ring
Keywords: Republican Conservative Libertarian GOP Political Campaigns Politics
-- Description: Webring for all Republicans with web sites. Very open on what defines a GOP web page, including personal websites, official party organizations, unofficial party social and support organizations, candidate/campaign sites, unofficial candidate support sites, issues-oriented sites and others that show their Republican identity. All pages must include at least a fairly visible mention of being a Republican to be elgible for entry into the Republican National Web Ring.

76 The Vast Right Wing Conspiracy (tvrwc) -- 330 sites -- List Home Random Search Ring
Keywords: conservative **Republican** Clinton Hillary politics GOP Conspiracy satire libertarian humor government
-- Description: The Vast Right Wing Conspiracy is the organization responsible for President Clinton's scandals, Hillary said so. The webring connects like minded conservatives, libertarians, **Republicans** who wish to show their membership in the Conspiracy.

76 The Republican DRAFT for 2000 Webring (rep2k) -- 7 sites -- List Home Random Search Ring
Keywords: **Republican** Conservative Politics Whitehouse 2000 Presidential Race President Campaign Democrat Liberal GOP POTUS right wing
-- Description: A ring of unofficial sites dedicated to drafting major **Republicans** into the 2000 presidential race.

75 Micronation and Virtual Nation Webring (micronations) -- 34 sites -- List Home Random Search Ring
Keywords: Micronation Virtual Nations Government Monarchy Oligarchy **Republican** Democratic
-- Description: This is ring that is intended to link all the monarchic, **republican**, oligarchic, democratic, and other for of governed micronations together, in an easy to access index.

73 Attachment Parenting for the GOP (apgop) -- 4 sites -- List Home Random Search Ring
Keywords: **Republican** conservative AP Attachment Parenting children
-- Description: MY webring was created for men and women who are **Republican** and choose to raise their child (ren) Attachment Parenting Style. We also have a mailing list as well! Come and join, you will meet a great group of people! :)

57 The College Republican WebRing (crring) -- 12 sites -- List Home Random Search Ring
Keywords: **Republican** conservative AP Attachment Parenting children
-- Description: The College **Republican** WebRing connects the ever growing and expanding College **Republican** presence on the internet. CR pages are popping up all over the Web, and the CR WebRing is the first attempt to link them all together. Members of this ring are dedicated to spreading the message of common sense conservatism on campus, getting **republicans** elected, and having fun in the process. You will find that CR pages contain some of the best material in cyberspace. Enjoy.

52 The GOP Webring (goponline) -- 13 sites -- List Home Random Search Ring
Keywords: GOP **Republican** Party Politics Vote Elect Candidate
-- Description: The GOP Webring is a continuing effort to bring **Republicans** across the Nation and World together. With your help there can be the world's largest **Republican** resource list.

51 Ring of Kennedyesque sites. (kennedyring) -- 1 sites -- List Home Random Search Ring
Keywords: Kennedy Lisa Montgomery Hey Ladies MTV VJ fans Lake Osewego Portland Oregon **Republican** grrl activist cultural icon
-- Description: Kennedyesque sites are run by people who are fans of former MTV VJ Lisa Kennedy Montgomery, concern **Republicanism**, pop/rock/alt music, girlishness, true beauty, chastity, people curious about Kennedy, &/or sites that have joined the "Stop Dissing Kenndy" ribbon campaign.

45 Limbaugh Listeners WebRing (limbaughwebring) -- 63 sites -- List Home Random Search Ring
Keywords: Limbaugh Rush **Republican** GOP Right Conservative
-- Description: This is a "Ring" established for the listeners of Rush Limnaugh. It features sites that compliment the views expressed on the popular radio show. THIS WebRing IS NOT AFFILIATED IN ANY WAY WITH RUSH LIMBAUGH, THE RUSH LIMBAUGH SHOW, THE EXCELLENCE IN BROADCASTING NETWORK, OR ANY OF ITS AFFILIATES.

45 The Liberal Ring (liberal) -- 63 sites -- List Home Random Search Ring
Keywords: liberal politics conservative liberalism political government democratic democrat **republican** left wing right leftist socialist socialism
-- Description: A ring of sites for the Liberal minded. Any subject dealt with in a Liberal manner (as opposed to conservative) is fine and will be accepted.

45 The Political Science and Politics Webring (polisci) -- 60 sites -- List Home Random Search Ring
Keywords: politics policy political science parties **Republican** Democrat
-- Description: This webring is dedicated to politics, political science, research in policy and public policy, or just plain party affiliated sites. If your site has politics in it, this ring is for you. Racist sites ARE NOT ACCEPTABLE However, international sites (as long as they are in English) are acceptable...

45 The Limbaugh Web Ring (limbaugh) -- 59 sites -- List Home Random Search Ring
Keywords: Rush Limbaugh Ditto conservative truth **Republican**
-- Description: A Web Ring for Rush Limbaugh sites and/or conservative sites.

44 Ring of Right Thinking Americans (rta123) -- 46 sites -- List Home Random Search Ring
Keywords: right conservative **republican** religious right right thinking american conservative
-- Description: This is a webring set up for Right Thinking Americans. If you are of the conservative "right" then you belong here. No liberals allowed! Right Thinking American webring is set up to spread what's right and demolish what is wrong.

44 Conservatives against Biased Media and Network Propaganda (bias) -- 45 sites -- List Home Random Search Ring
Keywords: conservative conservatives media bias news networks politics political right-wing **republican** libertarian pro-family family television network cnn foxnews abc cbs nbc cable pbs
-- Description: This is a ring for politically conservative websites. Libertarians are welcome.

42 Second Amendment Web Ring (04850) -- 22 sites -- List Home Random Search Ring
Keywords: second amendment conservative **republican** patriotic current events constitution arizona desert southwest
-- Description: For individuals interested politics and in preserving and protecting the U.S. Constitution, in particular, the Second Amendment

42 Politics 2000 Web Ring (politics2000) -- 20 sites -- List Home Random Search Ring
Keywords: politics election 2000 candidates vote voting politician issues democrat **republican** libertarian gore president
-- Description: Politics 2000 is a year 2000 election ring dedicated to linking sites with information that voters would be interested in. These sites include major political sites and people with interesting political positions on issues. I maintain only high quality members in this ring. If you want to be part of a ring of quality political sites with a variety of positions run by a ringmaster with a proven record, this ring is for you.

42 No More Jesse Helms. The Ring. (helms) -- 17 sites -- List Home Random Search Ring
Keywords: Jesse Helms North Carolina free speech Politics **Republican** democrat democrats democratic
-- Description: A ring devoted to no more Jesse Helms in office, left wing ideas, and free speech. Come join us in showing your support for ridding ourselves of this great embarrassment to North Carolina and the USA and show your support for democratic ideas.

41 Campaign '98 Web Ring (campaign98) -- 12 sites -- List Home Random Search Ring
Keywords: elections campaigns politics usa democrat **republican** libetarian third-party candidates vote policy congress state senate representative city counsel president grass-roots
-- Description: The Campaign 98 webring is a resource to get you EXPOSURE, VISIBILITY for you & Your MESSAGE to America's Voter's.

41 Ring Of Iowa Political Sites (roips) -- 8 sites -- List Home Random Search Ring
Keywords: Politics **Republican** Democrat Iowa Reform Independant
-- Description: Web sites of political groups and parties in Iowa.

41 The Political Action Committee Web Ring (pacs) -- 5 sites -- List Home Random Search Ring
Keywords: political fundraising registered pac anti-democratic pro-**republican**
-- Description: The PAC Web ring is an association of web sites focusing on political action in the United States.

41 The Essential Book Circle (cbooks) -- 4 sites -- List Home Random Search Ring
Keywords: books history politics conservative liberal fiction government current events author authors social environment guns **republican** democrat philosophy
-- Description: A circle of authors presenting books on current topics.

Found 43 rings -- 1 - 25 --Next--

[Return to RingWorld]

WebRing Search Results

Your search turned up the rings listed below. You can also find
rings through RingWorld, the WebRing Directory!

Narrow the results of your search by checking the "All words" choice or the "Exact
Phrase" choice and clicking the Search button. Expand the results by checking the "Any
Word" choice.

> republican

Search for: ○ Any Word ● All Words ○ Exact Phrase
Include: ☐ Full Words Only ☑ Ring Descriptions ☑ Ring Names & Keywords

Ratings `All` Minimum Ring Size `0`

Found 43 rings -- 26 - 43 --Prev--

Score Results

41 My hero, Joe (mccarthy) -- 4 sites -- List Home Random Search Ring
Keywords: clinton DNC **republican** GOP democrat humor monica lewinsky newt gingrich
-- Description: "I have in my hand 57 cases of individuals who would appear to be either card-carrying members
or certainly loyal to the Communist Party, but who nevertheless are still helping to shape our foreign policy."

41 Lamar Alexander for President in 2000! (lamar4prez) -- 4 sites -- List Home Random Search Ring
Keywords: conservative RNC Rush Limbaugh government politics president legislation campaign Clinton scandal
lewinsky **republican** GOP congress senate taxes white house
-- Description: Helps promote the future Chief Executive of the United States, Lamar Alexander. All webpage
owners in favor of this great leader can join this ring and help his chance for 2000 by doing so. All interested are
asked nothing else than to place the ring on their front page. Go Lamar!

41 The Stop Buchanan Webring (byepatbye) -- 2 sites -- List Home Random Search Ring
Keywords: Anti Pat Buchanan liberal conservative **Republican** Reform Democrat liberal politics discussion
commentator
-- Description: This is a webring dealing with the biggest embarrassment to mainstream conservatism,
commentator/racist/anti-Semite/historical revisionist Pat Buchanan. This is a webring for those of us who just
wish he'd "GO PAT GO" AWAY. Throughout this webring you can find conservatives, moderates, and liberals
alike who believe that Buchanan's 1940's school of thought doesn't apply to modern America.

40 Freedom From Clinton's Clutches (ffccs) -- 1 sites -- List Home Random Search Ring
Keywords: Clinton Freedom **Republican** Conservative Politics American
-- Description: Freedom From Clinton's Clutches was created to announce our dislike for President Clinton and
his destructive effects on our great country. He has disrespected his office and the American people. We look
forward to the day when we are ALL free from his clutches.

35 Real American Patriot/Militia Ring (rapm) -- 34 sites -- List Home Random Search Ring
Keywords: United States minuteman armedforces guns firearms weapons freedom liberty patriot citizen militia
Constitution defense war invasion tyranny liberation
-- Description: This ring is for Real America Patriot and Militia pages and sites,if your pages are dedicated to
Constitution and a **Republican** form of Government this ring is for you.

33 Pro Liberty Ring (soverain) -- 1 sites -- List Home Random Search Ring
Keywords: Libertarian
-- Description: A ring for sites that are pro-liberty and pro-republican.

29 We Will Remember in 2000 Ring (wwremember) -- 63 sites -- List Home Random Search Ring
Keywords: liberal democrat democratic elections campaigns bill clinton ken starr republicans right wing left wing conservative political politics
-- Description: A ring for all the people who will remember what the republicans have done and will cast their vote accordingly in 2000. Your site need not be entirely based on this, just a link..a muse..a thought will do. Join now!

25 The Anarcho-Republican Organizing Committee (anarchorep) -- 2 sites -- List Home Random Search Ring
Keywords: liberal democrat democratic elections campaigns bill clinton ken starr republicans right wing left wing conservative political politics
-- Description: A ring for all the people who will remember what the republicans have done and will cast their vote accordingly in 2000. Your site need not be entirely based on this, just a link..a muse..a thought will do. Join now!

17 Independència del Països Catalans (idependenciacat) -- 47 sites -- List Home Random Search Ring
Keywords: independ ncia independencia autodeterminacio pa sos paisos catalans catalunya autodeterminaci autodeterminacio esquerra republicana autonomia llibertat estelada senyera catalanisme llengua
-- Description: Llocs relacionats amb la independència dels Països Catalans d'una manera o altre. Polítics, històrics, culturals, econòmics, artístics, geogràfics, esportius...

15 University of Tennessee Conservative Web Ring (utkconservative) -- 12 sites -- List Home Random Search Ring
Keywords: UTK Conservatives University Republicans Right wing
-- Description: University of Tennessee Knoxville Conservatives. A resource for the Right side of the campus.

15 McCain2000 Webring (mccain2000) -- 12 sites -- List Home Random Search Ring
Keywords: Republicans John McCain McCain2000 Gore Bush2000 EDole2000 presidential campaign finance reform Conservatives Moderates Liberals Democrats Libertarians Independents POW MIA GOP elections
-- Description: Welcome to the McCain2000 Webring - This ring is dedicated to the successful election of Arizona Senator John McCain as President in the 2000 elections.

15 Politic Talk (politctalk) -- 12 sites -- List Home Random Search Ring
Keywords: politics talk news Republicans Democrats RNC DNC current
-- Description: To be in the webring you must only have some political content on it. Your site must not have a lot of swearing, or ANY sexism or racism. You can be from any party. And no text from the Starr report on the front page!

6 Elizabeth Dole For President Webring (elizabethdole) -- 0 sites -- http://home.mkl.com/~dibbell/elizabet.htm Search Ring
Keywords: Elizabeth Dole Republican political nomination President United States 2000 election campaign candidate
-- Description: This webring will link together sites supporting the possible candidacy of Elizabeth Dole for the Republican nomination for President in the year 2000.

4 DubyaSux (dubyasux) -- 0 sites -- http://www.angelfire.com/me3/DubyaSux Search Ring
Keywords: George W Bush Dubya Republican Democrat President
-- Description: Keep the Bush Family out of the WhiteHouse, they have done enough to ruin this country already!

4 Northeast Tennessee Web Ring (n3e2t7) -- 0 sites -- http://www.etsu.net/students/democrats/webring.htm Search Ring
Keywords: East Tennessee Republican Democrat Western North Carolina College Democrats
-- Description: Web Ring Northeast Tennessee and Western North Carolina web sites.

4 The Keyes 2000 Web Ring (keyes2000) -- 0 sites -- http://www.gate.net/~fbc/keyes2000/webring.html Search Ring
Keywords: election keyes presidential race candidate 2000 conservative republican UN taxes abortion constitution
-- Description: This ring is made up of sites where the owners support the candidacy of Dr Alan Keyes for president of the United States in the 2000 election. Vote Keyes 2000 !

4 Revolution 2000 WebRing (revolution2000) -- 0 sites -- http://www.nmia.com/~warehous/revolution_y2k/
Search Ring
Keywords: **republican** freedom conservative militia voting pro-America
-- Description: A ring of Conservative websites seeking a voting revolution in the 2000 elections.

2 Guerrilla Commie's (guerrillacommie) -- 0 sites -- http://homepages.go.com/cgi-bin/file_manager.cgi Search
Ring
Keywords: Guerrilla Rage Commie Music korn Limp Bizkit Culture Irish Mexican Zapatista Politics Democrates
Republicans Adult Women Unity Money Speech EVIL world
-- Description: My Web Ring is about freedom of speech and other topics in the world that have been ignored.

Found 43 rings -- 26 - 43 --Prev--

[Return to RingWorld]

ATTACHMENT D

ELECTION RELATED WEB SITES

On January 1, 2000, searches for the respective candidates names and "2000" yielded the following results. While not all of these pages may contain express advocacy, the results provide some understanding of the breadth of political discourse on the Internet pertaining to the upcoming presidential election.

Candidates	Tripod members	Lycos Web search	AOL Web search	AOL Member
"Bush" and "2000"	1238 pages	8745 sites	659 sites	200 pages
"Gore" and "2000"	883 pages	5677 sites	423 sites	200 pages
"Bradley" and "2000"	608 pages	5712 sites	488 sites	200 pages
"Alan Keyes" and "2000"	49 pages	413 sites	73 sites	53 pages
"Orrin Hatch" and "2000"	38 pages	261 sites	47 sites	6 pages
"McCain" and "2000"	187 pages	1532 sites	202 sites	123 pages
"Forbes" and "2000"	408 pages	3647 sites	248 sites	124 pages