

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

JAN 6 3 22 PM '00

SULLIVAN & MITCHELL, P.L.L.C.

ATTORNEYS AT LAW

1100 CONNECTICUT AVENUE, NORTHWEST SUITE 330
WASHINGTON, D.C. 20036

2000 JAN -6 P 2:06

PAUL E. SULLIVAN*
CLETA DEATHERAGE MITCHELL
BOB DAHL
of Counsel

(202) 861-5900
(202) 861-6065 *facsimile*

**Admitted in California only*

January 6, 2000

Ms. Rosemary C. Smith
Acting Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Comments of Sullivan & Mitchell P.L.L.C.
in Response to Federal Election Commission's
Notice of Inquiry 1999-24

Dear Ms. Smith:

This is in response to the Commission's Notice of Inquiry 1999-24, regarding issues related to political activity on the internet. The firm of Sullivan & Mitchell P.L.L.C. represents a number of internet companies involved in various forms of political activities on the internet, as well as advising political campaigns and trade associations as to their permissible activity on the internet. We have submitted comments on behalf of two (2) of those entities separately, Voter.com, Inc. and eContributor.com, Inc.

The comments contained in this letter are more general in nature and are submitted as a result of our experience on behalf of all our clients engaged in various enterprises related to internet political activity.

While we welcome and have taken advantage of the opportunity to submit comments to the Commission in response to the specific questions posed in the Notice of Inquiry, we would suggest a possible additional format for ongoing review and discussion of the issues related to the internet for the balance of this election cycle.

Recommendation for Internet Advisory Working Group. We would recommend that the Commission consider establishing in the immediate future an Internet Advisory Working Group to address in an ongoing, informal, discussion-type format all the issues contained in the Notice of Inquiry as well as the additional topics that will surely be raised via the comments provided to the Commission in response to the Notice of Inquiry. Such an entity could meet for

Ms. Rosemary C. Smith
Acting Assistant General Counsel
Federal Election Commission
January 6, 2000
Page 2.

discussion on a regularly scheduled basis to address topics identified in advance of each meeting. A core group of persons identified as knowledgeable about specific issue areas could be asked to prepare brief comments or background information to share with the group, and all other interested persons could also attend and share information and comments on those specific topics. This could be done in a brown bag lunch format to encourage open discussion and informality.

We believe that interested members of the Commission, designated Commission staff and those of us from the regulated community (and our clients) who are engaged in internet political activities should be meeting regularly, *informally*, to consider and review developments and issues related to the internet.

We also are convinced that this is an ideal way for the Commission to proceed during this election cycle and is preferable to undertaking rulemaking at this time. Areas may be identified during the course of the year which may necessitate initiation of a rulemaking process next year or the seeking of Advisory Opinions this year.

In the meanwhile, however, the Commission and the regulated community can become familiar with the technology and the issues related thereto as we all acquire experience in its use, development and application. This is a unique process for the transformative potential of the internet.

We stand ready to assist the Commission in any way possible to simplify and streamline the process of understanding how this exciting new technology offers ever expanding opportunities for citizen involvement in the political process.

Thank you for your interest and the opportunity to submit these comments.

Sincerely,
SULLIVAN & MITCHELL, P.L.L.C.



Cleta Mitchell, Esq.
For the Firm