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BY FAX

The Secretary  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: **Notice 2011-52, Interpretive Rule on When Certain Independent Expenditures are "Publicly Disseminated" for Reporting Purposes**

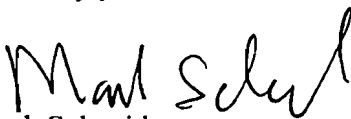
Dear Ms. Werth:

Service Employees International Union Committee on Political Education (SEIU COPE) is one of the country's largest political action committees, and it has engaged and intends in the future to engage in substantial independent expenditure activities. SEIU COPE therefore applauds the Commission for clarifying when political committees should first report independent expenditures. We believe the Commission sensibly identifies a set of activities any of which could appropriately be the trigger for independent expenditure reporting.

Specifically, we agree with the Commission that expenditures associated with communications that are "disseminated in stages" can properly be reported at any one of the four alternative dates set out in the Commission's Draft. SEIU COPE believes the Commission's Rule would be strengthened if it added to its illustrative list of communications disseminated in stages the oral communications that take place as part of a canvass operation. Reporting of expenses associated with these canvass communications sensibly should be treated in the same way as expenses associated with the handbills and buttons that are commonly distributed during canvass operations. Moreover, canvass communications share many of the same characteristics of the other forms of communications listed in the Draft, and therefore absent a clarifying rule the same ambiguities are present when determining how properly to report canvass activity. Thus, just like distributions of literature or buttons, canvass communications take place in stages, and are made up of many (sometimes a great many) individual communications with different individuals.

By making express that canvass communications are among the communications covered by the Interpretive Rule the Commission would strengthen the rule and provide needed guidance for groups and individuals seeking to comply with the Commission's critical reporting regime.

Sincerely yours,

  
Mark Schneider  
Counsel for SEIU COPE