



FEDERAL ELECTION COMMISSION
Washington, DC 20463

July 9, 1976

AO 1976-34

Honorable John B. Anderson
Chairman, Republican Conference
House of Representatives
Washington, D. C. 20515

Dear Mr. Chairman:

This refers further to your letter of May 27, 1976, requesting an advisory opinion, if appropriate, as to the application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to various functions of the House Republican Conference, the House Republican Policy Committee and the Republican Research Committee.

The activities of each of these offices focus on the support of incumbent Republicans of the House of Representatives. According to your letter, each of the named groups prepares and distributes research memoranda to incumbent Members of Congress on legislation and policy issues pending before the House. Although non-incumbent Republican candidates are added to the House Republican Conference's mailing list at their request and, on rare occasions, special research tasks are performed at the request of and for the use of non-incumbent Congressional candidates, most non-incumbent requests to any of the three offices are referred to the National Republican Congressional Committee.

Your letter further states that the activities of the three offices are funded through legislative appropriations. The Commission assumes that these legislative appropriations are the sole source of funds received by each of the said offices. The Commission does not believe that Congress intended that the receipt of legislatively appropriated funds should be deemed as the receipt of a statutory contribution as defined in 2 U.S.C. §431(e). Accordingly, and based on the aforestated assumption, it is the Commission's

opinion that none of the three named offices constitutes a political committee required to register and report under the Act.

This advisory opinion concerns the application of a general rule of law stated in the Act to the specific factual situation set forth in your request.

Sincerely yours,

(signed)
Vernon W. Thomson
Chairman for the
Federal Election Commission