

8 SEP 1976

O/R 720

Ms. Connie Fortune  
Voters Service Chairman  
League of Women Voters  
Education Fund  
1730 M Street, N.W.  
Washington, D.C. 20036

Dear Ms. Fortune:

This responds to your letter of August 5, 1976 requesting an opinion regarding the insertion with telephone bills of non-partisan voter registration information prepared by the League of Women Voters.

As my letter of August 8 indicated, the 1976 Amendments to the Act have modified the advisory opinion procedures set forth in 2 U.S.C. §437f. I must note that you appear to lack standing to receive a statutory advisory opinion since you have not indicated that you are requesting an opinion on behalf of a Federal candidate, officeholder, or political committee. Furthermore, 1976 Amendments state that opinions of "an advisory nature" may not be issued by the Commission or its staff except through the statutory advisory opinion procedure. Therefore, this letter is issued for informational purposes only.

Your letter asks whether under §114.4 of the Commission's proposed regulations, a corporation may reprint and include along with its monthly billing of customers, non-partisan voter registration information prepared and supplied by the League of Women Voters of Alabama which is an affiliate of the national League of Women Voters. Section 114.4 does permit a corporation or labor organization to distribute voter guides or brochures describing the candidates and

their positions if the materials do not favor any particular candidate or party, and if the materials were obtained from a civic or non-profit organization which does not endorse or support or is not affiliated with any candidate or political party.

This proposed regulation would allow the described materials, prepared by the League, to be included in the corporation's monthly billings. If you have further questions that are not answered by the proposed regulations, which were published in the Federal Register on August 25, 1976, please do not hesitate to contact us. Thank you for your cooperation. I hope this information is helpful for purposes of your inquiry.

Sincerely yours,

"Signed"

N. Bradley Litchfield  
Assistant General Counsel

Enclosure

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