



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 18, 1976

AO 1976-98

Honorable Barry Goldwater, Jr.
Honorable Dale Milford
House of Representatives
Washington, D. C. 20515

Dear Messrs. Goldwater and Milford:

This refers to your letter dated October 1, 1976, requesting an advisory opinion from the Commission concerning whether implementation of a proposal made by the Airline Transport Association (ATA) would involve a prohibited corporate contribution under 2 U.S.C. §441b.

In brief, ATA proposes to sponsor Members of Congress, who serve on congressional committees having jurisdiction over aviation matters, to attend air carrier pilot training courses at an air carrier flight academy convenient to their home district. The cost of the course of instruction paid by ATA (and/or its participating member companies) would be approximately \$9,000, and the course would require each participating Member of Congress to spend approximately 120 hours in formal classes, flight simulators, and training aircraft.

You ask four specific questions and request the Commission's opinion on any question coming within its jurisdiction; there is only one such question, and that is whether acceptance of the ATA offer would constitute an unlawful corporate contribution under 2 U.S.C. §441b. It is the Commission's opinion that participation by members of the relevant congressional committees in flight training courses funded by ATA would not involve the making (or acceptance) of an unlawful corporate contribution or expenditure under 2 U.S.C. §441b. We, of course, do not express any opinion on the application of other Federal laws outside the jurisdiction of the commission, or on applicable rules of the House of Representatives, to the described proposal.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act to the specific factual situation set forth in your request. 2 U.S.C. §437f.

Sincerely yours,

(signed)

Vernon W. Thomson

Chairman for the

Federal Election Commission