



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

May 13, 1977

Re: AOR 1977-6

Anthony L. Hodges
Continental Oil Company
P.O. Box 2197
Houston, Texas 77001

Dear Mr. Hodges:

This refers to your letter of February 14, 1977, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to a payroll deduction and stock dividend withholding system for facilitating voluntary political contributions from executive and administrative employees and stockholders of the Continental Oil Company to the CONOCO Employees Good Government Fund ("the Fund").

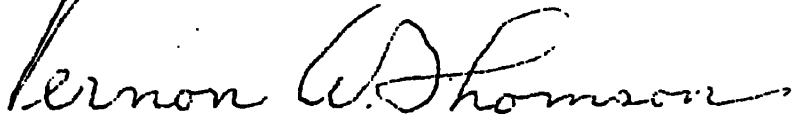
Your letter indicates that the Fund is considering use of payroll deduction and stock dividend withholding to facilitate contributions to the Fund from executive and administrative personnel of Continental and from its stockholders. You have asked several questions, which involve application of 2 U.S.C. §441b(b)(6), as to the reciprocal obligations which arise with respect to making a similar method available to the separate segregated fund(s) of labor organizations with members who are employed by Continental.

The Commission has considered and discussed a substantive response to your opinion request but has concluded that an advisory opinion is inappropriate under 2 U.S.C. §437f(a) which provides in part that advisory opinions must concern the application of a general rule of law stated in the Act or prescribed as a rule or regulation by the Commission. Both the Act and the Commission's regulations are silent with respect to the duration in time of the corporation's duty to make available to a labor organization any method which the corporation has used to facilitate voluntary contributions from its executive or administrative personnel or stockholders to the corporation's separate segregated fund.



The Commission expects to consider in the near future amendments to its regulations as prescribed on April 13, 1977, 42 Fed. Reg. 19324. At that time the Commission will consider proposing regulations pursuant to 2 U.S.C. §438(c) which will address the issues raised by the questions you presented. The Commission appreciates your patience and understanding of the circumstances which preclude responding to your request with an advisory opinion at this time.

Sincerely yours,

A handwritten signature in cursive script, reading "Vernon W. Thomson". The signature is written in dark ink and is positioned above the printed name and title.

Vernon W. Thomson
Chairman for the
Federal Election Commission