



FEDERAL ELECTION COMMISSION
Washington, DC 20463

October 13, 1988

CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1988-42

Neil C. Taylor
Taylor, Moseley & Joyner
501 West Bay Street
Jacksonville, Florida 32202

Dear Mr. Taylor:

This responds to your letter of August 25, 1988, in which you request an advisory opinion on behalf of Atlantic Marine, Inc. ("AMI"), and Atlantic Dry Dock Corp. ("ADD") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the proposed naming of AMI's and ADD's new separate segregated fund.

In Advisory Opinion 1988-14, issued April 22, 1988, the Commission advised you that AMI and ADD are corporate affiliates under the Act and that as affiliates they may jointly establish a separate segregated fund to receive and to make political contributions. The Commission also discussed the corporations' suggested name for their political fund, "Atlantic Marine and Atlantic Dry Dock Separate Segregated Fund":

Under the Act and Commission regulations, the name of any separate segregated fund must include the full name of its connected organization. 2 U.S.C. 432(e)(5); 11 CFR 102.14(c). While the regulations permit the use of a clearly recognizable abbreviation or acronym, the separate segregated, fund must use the complete official name of its connected organization in its Statement of Organization, in all reports filed by the PAC, and in all disclosure notices. See 11 CFR 109.3, 110.11 Accordingly, because AMI and ADD are joint sponsors of a single PAC, they may establish a PAC with an

official name that includes the full name of both corporations. A name that meets the requirements would be: "Atlantic Marine, Inc., and Atlantic Dry Dock Corp. Separate Segregated Fund."

You now ask whether the suggested official name "Atlantic Marine and Atlantic Dry Dock PAC" for AMI's and ADD's separate segregated fund would meet the requirements of the Act and Commission regulations.

The proposed official name fails to include the full name of each of the separate segregated fund's connected organizations. 11 CFR 102.14(c). Atlantic Marine's full name is Atlantic Marine, Inc. Atlantic Dry Dock's full name is Atlantic Dry Dock Corp. The official name of AMI's and ADD's separate segregated fund must contain these full names. See, e.g., Advisory Opinions 1980-23 and 1980-10. As modified, therefore, the full or official name of the new separate segregated fund would have to be: "Atlantic Marine, Inc, and Atlantic Dry Dock Corp. PAC."*

This response constitutes an advisory opinion concerning the application of the Act or regulations prescribed by the Commission to the specific transaction or activity set forth in your request. See 2 U.S.C. 437f.

Sincerely,

(signed)

Thomas J. Josefiak
Chairman for the Federal Election Commission

Enclosures (AOs 1988-14, 1980-23, and 1980-10)

*/ The Commission notes that the term "PAC," an acronym for "Political Action Committee," is sufficiently well known through public media usage that it may be included in the official name of a separate segregated fund.