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May 1, 1996

NOV 3 1996 '96 20

Mr. Brad Litchfield
Associate General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Dear Mr. Litchfield:

Please provide me with a written opinion of the following rules of the Federal Election Commission (FEC) regarding the use of campaign funds for political/campaign purposes by congressional staff.

As a delegate from Oklahoma to the Republican National Convention, I will be attending all activities during the convention this August in San Diego, CA. During the National Convention I will participate in the following activities in which I, my Chief of Staff (COS) or both will be involved;

1) Official duties; My congressional office will continue to operate while I am attending the convention. My COS will act as liaison to my offices during that week. Further, the policy nature of the conventions may require staff assistance. Any policy briefings that occur, my COS would attend.

2) Campaign activities; The political nature of conventions provides excellent fund raising opportunities for my campaign. Also, campaign vendors attend and promote services that may be beneficial to my campaign. As my chief political advisor, he represents me in all campaign related matters. Fund raising and the choice of professional campaign services are important to my congressional campaign.

Additionally, I serve as National Co-Chairman for the "Rural Americans for Dole." My COS will need to attend, on my behalf or with me, any activities related to this commitment. The success of the national ticket, and my role in that effort, has a direct impact on my reelection efforts.

Examples:

We plan to contact in advance, top GOP contributors who have an interest in the issue areas I am most active, and make arrangements to meet during the convention.

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Lucas for Congress Committee.

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We have an interest in expanding our voter lists and data base and will be visiting with vendors who attend the convention about their products. There will be several general election strategy meetings with the Dole campaign that my COS must attend for me.

Specifically, I desire to know if Lucas for Congress funds can pay the travel and subsistence expenses for my Chief of Staff to the Republican National Convention? Also, can the campaign reimburse him for these expenses or does the campaign have to directly pay these costs?

Arrangements are currently being made for this August event, so a prompt reply would be appreciated. Thank you.

Sincerely,



FRANK D. LUCAS
Member of Congress