



# NATIONAL RURAL LETTER CARRIERS' ASSOCIATION

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**KEN PARMELEE**

VICE PRESIDENT OF GOVERNMENTAL AFFAIRS

**CASSIE FOLK**

LEGISLATIVE REPRESENTATIVE

Supplement to  
AOR 1999-06

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
MAR 24 10 49 AM '99

March 23, 1999

N. Bradley Litchfield  
Associate General Counsel  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Mr. Litchfield:

This will confirm my oral responses to your telephone inquiry of March 8, 1999, with reference to Advisory Opinion Request 1999-06 which I have submitted on behalf of the National Rural Letter Carriers' Association ("NRLCA"), a labor organization. This letter is a supplement to my opinion request.

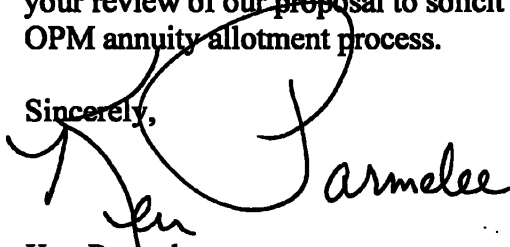
The NRLCA request is limited to those individuals who meet all the following criteria: they are within the "active membership" category of NRLCA, they are retired rural letter carriers, they pay dues to NRLCA, and they receive an annuity from the U.S. Office of Personnel Management ("OPM") based on their past employment with the United States Postal Service. This group of NRLCA members are eligible under OPM rules and guidelines to make contributions to the NRLCA PAC by authorizing allotments for that purpose from the monthly annuity payments they receive from OPM.

The NRLCA governing documents I submitted with this request do indicate that we have other categories of members, such as honorary and associate members. These are described in the NRLCA Constitution, article III, Sections 1 & 2. These two membership categories, which total about 450 individuals, receive the NRLCA magazine and some of them pay dues to NRLCA. However, we do not propose to solicit them for contributions to our PAC and will not use the annuity allotment process to receive PAC contributions from them.

Furthermore, only 17 of these individuals out of 309 dues paying associate members are actually annuitants. The 150 honorary members in this category are composed either of U.S. Postal Service officials who perform "labor relations" functions or congressional personnel, both groups receive the magazine complimentary in order to keep track of the union's printed statements. The honorary list is "cleaned" annually by NRLCA officers and staff so when postal officials retire their names would be deleted.

For the above reasons, I request that your office and the Commission exclude the individuals in these other NRLCA membership categories from your review of our proposal to solicit and accept PAC contributions via the OPM annuity allotment process.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Parmelee". The signature is written in a cursive style with a large, prominent initial "K".

Ken Parmelee  
Vice President of Governmental Affairs