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October 14, 1999

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COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
OCT 18 3 11 PM '99

N. Bradley Litchfield, Esq.  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Supplement to  
AOR 1999-29

Re: Advisory Opinion Request

Dear Mr. Litchfield:

On behalf of Bill Bradley for President, Inc. ("the Committee"), we wish to amend our advisory opinion request of October 12, 1999 to place an additional, related question before the Commission.

Section 110.8(c)(2) of the Commission's regulations provides that a Presidential candidate accepting public funds "may treat an amount that does not exceed 50% of the candidate's total expenditures allocable to a particular state . . . as exempt fundraising expenses."

The Committee requests an opinion on whether, under this provision, the maximum amount that may be excluded from a state expenditure limit is 50% of the amount of the limit, or 50% of the amount the campaign actually spends on allocable categories. The former interpretation would effectively permit a publicly funded campaign to spend up to 150% of the state expenditure limit. The latter would allow for spending up to 200% of that limit.

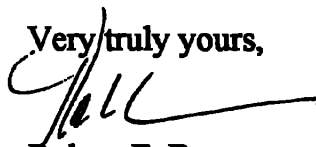
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October 14, 1999  
Page 2

As before, an expeditious response is especially necessary because of the brief amount of time between the date of this request and the first caucus or primary. As in the previous question raised about direct mail, this question is purely one of law.

If you have any questions, please contact us at the above address and phone number.

Very truly yours,



Robert F. Bauer  
Brian G. Svoboda  
Counsel to Bill Bradley for President, Inc.