

**WARNER NORCROSS & JUDD LLP**

ATTORNEYS AT LAW

900 FIFTH THIRD CENTER

111 LYON STREET NW

GRAND RAPIDS MICHIGAN 49503-2487

TELEPHONE (616) 752-2000

FAX (616) 752-2500

November 15, 2002

WILLIAM W. HALL

(616) 752-2113  
whallw@wnj.com

SENT VIA FAX AND FIRST CLASS MAIL

*Extension for*

Jonathan Levin, Esq., Senior Attorney  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

*AOR 2002-14*

2002 NOV 15 P. 4:22

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Re: **Libertarian National Committee, Inc. ("LNC") Request for Advisory  
Opinion - AOR 2002 - 14**

C  
O  
P  
Y

Dear Mr. Levin:

This letter will confirm the substance of our recent telephone conversation.

As you know, I am the General Counsel of the Libertarian National Committee, Inc., the National Committee of the Libertarian Party® in the United States ("LNC"). I am writing this letter on its behalf.

Effective September 23, 2002, I filed an advisory opinion request on behalf of the LNC with respect to certain of its ongoing business (not political) activities, including, its practice of renting its mailing list, selling advertising in its party newsletter ("LP News") and licensing trademarks owned by it. In the past, the LNC treated receipts from these operations as non-federal funds. However, effective November 6, 2002, the LNC anticipated that, because as a national political party committee it could no longer maintain a non-federal account, it would need authorization from the Federal Election Commission to deposit those funds in its federal account.

Pursuant to a letter dated October 3, and received by me on October 8, 2002, your office requested certain additional information regarding the advisory opinion request. I provided that information pursuant to a letter dated October 24, 2002.

Recently, you contacted me and advised me that under the applicable law and regulations, the FEC was required to respond to my request by December 24, 2002. You indicated that you do not believe this is possible given the FEC's current workload, and requested an extension of the date for the FEC to respond.

The LNC had hoped to obtain guidance from the FEC concerning its existing and ongoing business operations within a few days following the effective date of the Bipartisan

Jonathan Levin, Esq., Senior Attorney  
November 15, 2002  
Page 2

---

Campaign Reform Act on November 6, 2002. In order to avoid the possibility that it might violate the law, the LNC has since refused to rent its mailing list and refused to sell advertising in LP News to corporate advertisers. This has already resulted in a material loss of revenues to the LNC, and hampered its abilities to engage in political activities.

The LNC, nevertheless, desires to cooperate with the FEC in order to permit the FEC to efficiently deal with its workload.

The LNC agrees to extend the date by which the FEC must respond to the LNC's advisory opinion request 2002-14 until Friday of the calendar week following the FEC's first public meeting in the month of January 2003. For example, if the first public meeting of the FEC occurs on Thursday, January 9, 2003, then the LNC gives the FEC until the following Friday, January 17, 2003, in order to render its decision to the LNC.

I trust that this extension will be accepted in the spirit in which it is given: as an attempt by the LNC to work with the FEC toward a reasonable resolution of these complex issues.

Very truly yours,

William W. Hall

WWH/md

Cc: Mr. Geoffrey Neale

815658