



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

**TO: THE COMMISSION
ACTING STAFF DIRECTOR
ACTING GENERAL COUNSEL
FEC PRESS OFFICE
FEC PUBLIC DISCLOSURE**

FROM: OFFICE OF THE COMMISSION SECRETARY *SW*

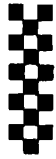
DATE: June 14, 2011

**SUBJECT: Comment on Draft AO 2011-09
(Facebook)**

Transmitted herewith is a timely submitted comment from Internet Alliance by Tammy Cota, Executive Director regarding the above-captioned matter.

Draft Advisory Opinion 2011-09 is on the agenda for Wednesday, June 15, 2011.

Attachment



Tammy Cota, Executive Director
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▶ Fax

6/14/2011

From: Tammy Cota
Phone: Cell: 802-279-3534

Company Name: Internet Alliance

To/Fax: Christopher Hughey, Esq. 202-219-3923
 Shawn Woodhead Werth 202-208-3333

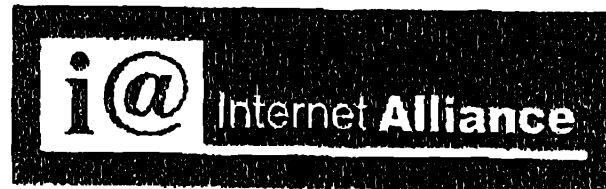
Pages: 2 (including cover)

Comments:

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June 14, 2011

Christopher Hughey, Esq., General Counsel
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Hughey:

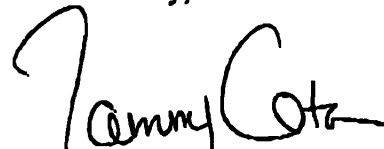
The Internet Alliance (IA) wishes to express support for Draft B Advisory Opinion 2011-9. The IA also supports Facebook's request dated May 9, 2011, asking that its small, character-limited ads qualify under the "small items" and "impracticable" exceptions, therefore not requiring a disclaimer under the Federal Election Campaign Act or the Commission regulations.

IA members fully support effective disclosure of the source of political advertisements, as it creates and promotes transparency among voters and believe campaigns should make full use of the Internet, especially when it comes to search engine, mobile media or any other small display advertising methods. That is why IA members also support AOL's request, dated May 16, which asks the Commission to grant flexibility to everyone in an evenhanded manner that does not advantage one competitor over another.

New Internet products and services are created and changed almost daily. For these reasons we urge the Commission to confirm that all small, character-limited ads delivered online qualify for the "small item" and "impracticable" exceptions, therefore would not require a disclaimer under the Federal Election Campaign Act or the Commission regulations.

Thank you for taking the time to look at this issue. I am available any time to answer questions or put you in touch with individual members for further discussions.

Sincerely,



Tammy Cota

cc: Shawn Woodhead Werth, Commission Secretary