

Comment on AOR 2012-31

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OFFICE OF GENERAL
COUNSEL

September 7, 2012

Federal Election Commission
Office of the General Counsel
Advisory Opinions
999 E. Street N.W.
Washington, DC 20463

Re: Advisory Opinion Request 2012 - 31

Dear Commissioners:

As a co-requester to the two Advisory Opinions the Commission recently issued (2012-17 and 2012-26), we strongly support the issuance of an additional advisory opinion of the nature requested by AT&T. As a political consulting firm that works closely with Presidential campaigns on advertising and mobile communications, we agree with the recommendation that the FEC issue an advisory opinion permitting carriers to set unique and low fees for the new political contribution programs, in the manner that AT&T sets forth in its present request.

We wish to congratulate the Commission on its recent prompt actions in the Advisory Opinions it has recently issued to us and our co-requestors as well as to the wireless carriers themselves through CTIA, the industry's trade association, in Advisory Opinion 2012-28. The wireless carriers and the mobile messaging industry have reacted extremely promptly to allow Americans to support their candidates through convenient text contributions. The CTIA, with the support of its members, has issued clear industry guidelines implementing the Commission's Advisory Opinions in practical and clear form.

As of last week, subscribers to virtually every carrier other than AT&T can already contribute \$10 to Romney for President by texting the word "GIVE" to short code 37377, or to Obama for America by texting the word "GIVE" to short code 62262. This program is available today to subscribers of substantially all U.S. carriers other than AT&T.¹ Each of those political committees has publicly stated their hope to also offer the program through AT&T.

Because Romney for President and Obama for America are candidate committees facing an election within the next 60 days, we respectfully request that the Commission also accept AT&T's request for expedited treatment, and issue the new advisory opinion as quickly as possible.

We understand AT&T's position for waiting, which they have clearly set forth in the present advisory opinion request. We respectfully submit that promptly issuing AT&T an affirmative advisory opinion will bring even more Americans the opportunity to participate in this program, and will serve finally to implement the Commission's decision in this matter.

Mobile technology has allowed more Americans than ever to join in and be a part of our highest elections. We believe that our democracy is stronger when all Americans have the right to let their voices be heard.

Sincerely,



Mark Armour
CEO, ArmourMedia, Inc.

cc: Craig Engle, Esq., FEC counsel to ArmourMedia, Inc.
cc: Steve Goldberg, Red Blue T, LLC

¹ This fact is public information, and can be confirmed by texting the word "GIVE" to each short code from any handset connected to any of these carriers.