



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission
FROM: Commission Secretary's Office 
DATE: September 18, 2012
SUBJECT: Comment on Draft AO 2012-31
(AT&T Inc.)

**Attached is a timely submitted comment from Alan Sege, Esq.
on behalf of payvia political inc.**

Attachment

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2012 SEP 18 11:09 AM

OFFICE

September 17, 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:

We are proud to participate, along with so many other like-minded professionals at all of our nation's carriers, the major political parties and committees, and the Commission in this final decision which will bring a new, broad-based, openly available fundraising program to our democracy.

We submit this comment to congratulate all of those who collaborated with their own work and viewpoints, and respectfully encourage the Commission to issue this draft Advisory Opinion as soon as possible.

Early this year, a few of us recognized that by applying the technology and procedures that we use every day in our normal work for carriers and consumer businesses, we could offer a technical solution that would enable masses of Americans to make their voices heard. In submitting the m-Qube advisory opinion request 2012-17, we were cognizant that we are not a carrier and we are not a political committee. We could only make that request based on our own experience providing carrier messaging and billing service, in the normal and usual manner.

The present advisory opinion request by one of the world's best telecommunications' system operators -- AT&T -- completes this process. The request takes the necessary final step of recognizing that for this program to be a true success, it must not be constrained to the normal and usual carrier rates applied to commercial content providers.

There was no organized plan that brought us to this day. Instead, since last March, one by one, we worked with members of both political parties, good government groups, the major political committees, and then the carriers led by the CTIA who saw much more in our technical proposal than even we first imagined. Each brought their own unique contribution. Each advisory opinion request brought by these distinct and essential groups in our political society and communications infrastructure brought its own necessary improvement.

Then, in just the two short weeks following your August issuance of advisory opinion 2012-28 to the CTIA, we all participated in the most rapid deployment of a cross-carrier value added service in our nation's history. It took an incredible and well-choreographed joint effort by our entire industry, spearheaded by the CTIA leadership, to organize cross-carrier rules, devise the consumer-facing messaging and marketing details, and enable and test high-capacity systems for both major presidential candidate committees.

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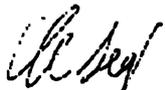
Of course, neither a ruling from the Commission alone, nor a corporate decision by carrier executives could make that possible. It resulted from late nights and intense effort by those working at each company, recognizing that this urgent job was one of the most important we could ever complete.

We also thank the Commissioners and the able Commission staff. In this short time, through this series of complex advisory opinion requests, you applied critical intricacies of our industry in a focused way that has solved problems, and enabled this exciting new program. Issuing the present advisory opinion will complete the process, and create the most efficient and convenient means for campaign finance contribution ever devised.

We do not specialize in politics or campaign finance. We make our living by offering message transmission and carrier billing for online services and digital goods. payvia political (http://www.uscpayvia.com/political_contributions) is m-Qube's new brand, already providing this new service to federal political committees and carriers. And, following issuance of this advisory opinion, we will be able to offer it to AT&T subscribers as well.

We are very gratified that everyone involved liked and supported our idea to bring every American this immediate and easy way to support their candidates. It has been a perfect example of the political parties, the industry, the federal government, and a great many dedicated professionals working together to accomplish something great.

Sincerely Yours,



Alan Sege, Esq.
On behalf of payvia political, inc.
Direct: (310) 957-3301

cc: Mark Armour, Armour Media, Inc.
Steve Goldberg, Red Blue T, Inc.
Craig Engle, Esq., Arent Fox