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Reply To: [ray.cashman](#)
To: tbuckley@fec.gov
Subject: DR Advisory Opinion Draft Response
Date: 07/14/2015 02:02 PM

Page 9, Line 20: A commercial service provider may not unilaterally determine the potential recipients of its users' contributions, much less override users' choice of recipients.

DR does not determine how a user allocates their funds on account (which are not political contributions until they are pledged to an issue). User funds can also be used to make administration donations, to support an advocate group in a Long term Campaign, to donate to Disaster Relief, and soon, to purchase merchandise. Nor does DR determine the recipients of our user's contributions: DR's presentation cycle process was specifically designed to ensure that users make these decisions. Before pledging funds to an issue, or even before polling on an issue, users know exactly which legislator(s) could receive their funds. DR clearly displays the name of the legislator who will receive a user's contributions in both our polling and pledging sections, plainly visible before a user pledges any funds. Please view a typical issue in our polling section. Legislators are associated with each polling option. Likewise, the legislator's name is also displayed directly above the pledging function, leaving no doubt as to who the recipient could be. It is important to remember that users who participate in DR are interested in affecting issues. Sometimes this can be best achieved through legislative means, sometimes through advertising campaigns, lawsuits and other actions by advocate groups. Users agree, if not insist, that the funds they pledge to an issue are intended to affect that issue. If users do not agree with the legislators displayed (or with any aspect of the presentation cycle) they may simply decide not to contribute – in effect, voting with their feet, or in this case, their wallet. If they choose to contribute, it is because they agree the legislators DR has chosen have the best chance to affect an issue. DR in no way decides who receives contributions - users do this by agreeing whether or not to pledge funds. If a user wishes to donate to different legislator, they are free do access that lawmaker's website and do so.