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February 17, 2000

John R. Velasquez, Jr.
Acting Central Enforcement Docket Supervisor
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4962
Cable News Network (CNN)

Dear Mr. Velasquez:

This letter responds to the complaint filed with the Commission by LaRouche's Committee For A New Bretton Woods (hereinafter Complainant) on January 18, 2000, which was served on CNN on February 3, 2000. Enclosed herewith is a signed Statement of Designation of Counsel. CNN appreciates the opportunity to respond and does so as follows.

The Complainant alleges that CNN made an illegal corporate contribution to the presidential campaigns of Vice-President Albert Gore and Bill Bradley when it sponsored a debate between the two candidates and did not invite Lyndon H. LaRouche to also participate. CNN is not owned or controlled by a political party, political committee or candidate. Therefore, CNN may "stage" candidate debates without violating the prohibition on corporate contributions as long as the structure of the debates meets the criteria set forth in 11 CFR §110.13(b), and the selection of candidates follows CNN's pre-established objective criteria.

The debate complained of took place on January 27, 2000. Structurally, the debate involved two of the candidates seeking the Democratic nomination in August. In inviting these two candidates, CNN considered each candidate in relation to its pre-established criteria set forth below:

1. Was the candidate actively campaigning;
2. The candidate's ability to fundraise/level of financial support;
3. Percentage of votes won in a caucus or primary[1];
4. Where did the candidate stand in the public opinion polls.

At the time of the debate CNN had no evidence that Mr. LaRouche was actively campaigning. Mr. LaRouche had not raised a significant amount of money and was not factoring high enough in public opinion polls. As a result of this analysis, CNN did not extend Mr. LaRouche an invitation to participate in the January 27 debate.

CNN's coverage of political news stories, including its participation in staging political debates, is both balanced and fair and not to the benefit of any particular candidate or political party. Notwithstanding the fact that CNN has complied with the Commission's rules regarding the staging of candidate debates, CNN expressly reserves its rights under the First Amendment to the U.S. Constitution. CNN respectfully requests the Commission take no further action against it and dismiss CNN from this MUR.

Again, CNN appreciates the opportunity to respond. If you have any questions regarding this response, please do not hesitate to contact me.

Respectfully submitted,

Barbara W. Bonfiglio
Counsel for CNN

Cc: Susan Tungate, Esq.
CNN

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[1] As the date of the debate in question preceded any caucus or primary, this particular criterion was not considered.

STATEMENT OF DESIGNATION OF COUNSEL

MUR ___4962___

NAME OF COUNSEL: ___Barbara W. Bonfiglio___

ADDRESS: ___Williams & Jensen, PC___

___1155 21st Street, NW, Suite 300___

___Washington, DC   20036___

TELEPHONE: ___(202) 659-8201___

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

___2/15/00___
Date

___[signature]___
Signature

RESPONDENT'S NAME: ___Cable News Network LP, LLLP___

ADDRESS: ___One CNN Center, Box 105573___

___Atlanta, GA   30348-5573___

HOME PHONE: _____

BUSINESS PHONE: _____