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September 30, 2024

Ms. Amy L. Rothstein
Assistant General Counsel for Policy
Federal Election Commission
Office of General Counsel
999 E Street, NW
Washington, D.C. 20463

Re: Notice of Availability: Petition for Rulemaking to Strengthen Political Parties

Dear Ms. Rothstein:

I write regarding Notice 2024-18 and the Federal Election Commission's Rulemaking Petition regarding rules for political parties, REG 2024-07 Political Party Rules II.

I write to encourage the Federal Election Commission to support and strengthen state parties and our political system as a whole, by amending and modernizing the rules regarding political parties.

As someone who works everyday as the Executive Director of the Democratic Party of Oregon, and as someone who's worked with political parties since 1992, the time for reform is long overdue. While many of the rules we currently operate under were enacted with the best of intentions, many have become outright obstacles and block the ability of political parties to effectively organize citizens or support our candidates.

Due to complex and outdated federal regulations we are unable to adequately support and work with state and municipal candidates.

To make matters worse, while the state party works diligently to comply with complicated federal regulation every single day, we watch outside groups come into Oregon and spend freely, attacking our candidates with nominal regulation.

This is not a partisan issue. This is a participation issue, with regulations negatively impacting the ability of all political parties to engage our voters and compete fairly in our political system. The consequences? A severe weakening of political parties across the nation and a transfer of power to the independent, often unregulated political operations

which have flourished in the last decade. I truly believe the critical role state parties play in our democratic system is threatened. Any efforts the Commission can make to update and reform the regulations that hamper state parties are timely and critical to our future.

Three examples of areas for reform include:

- *Modernizing the rules around “volunteer exempt mailings.”* Federal laws passed in 1979 allow state parties to engage in mailings in support of federal candidates as long as the party has substantial volunteer participation. Since 1979, mail houses have been significantly modernized making it much harder for state parties to productively involve volunteers into that process. Challenges include the safety of our volunteers and our ability to provide them with insurance coverage, respecting worker and union rights at the mail house, as well as the practical inability for volunteers to transport the mail from the mail house to the post office due to post office rules. Sensible reform in this area would be most helpful and long overdue.
- *Redefining and narrowing the definitions of Get-out-the-Vote and voter registration activities so that non-federal activities are no longer inappropriately regulated under the Act.* This would allow state parties to more easily engage in these important civic programs. These largely non-federal activities face increased federalization even when they target state and local candidates. Moreover, Oregon state law has seen hugely impactful changes to laws regarding voter registration and voting processes since 2002, including automatic voter registration, vote by mail, and pre-paid ballot postage. Each change requires voter education, which we are restricted in performing due to the “incidental rule” regarding voting information. As such, our ability to help duly registered voters exercise their right to vote is hampered by the current regulations of BCRA.
- *Limiting the Payroll 25% Rule to only true Federal Election Activity.* Currently the Commission’s rules dictate that employees who spend more than 25% of their monthly time on FEA should be paid with 100% federal money, yet the Commission also defines FEA much too broadly. For example, under the current rule, a state party employee who spent 0% of their time canvassing in support of Federal candidates, but more than 25% of their time on *non-federal GOTV activities* would need to be paid with federally-regulated and federally-limited funds. As currently written, this rule fundamentally oversteps and encroaches on the states’ rights to regulate the activities surrounding their own elections.

I know many other proposals for regulatory reform have been presented to the Commission for the purposes of easing undue burden on state parties and increasing their ability to operate effectively. Please give them your fullest consideration.

Please know that while we fully support campaign finance and reporting regulations, these regulations should be common sense. They should not overstep states' rights, and they should not unfairly disadvantage any participant.

State parties must be able to reach out to voters to earn their support for their candidates and causes and mobilize them to vote and participate in our political process. But we cannot accomplish these important tasks if we are overwhelmed with restrictive federal regulation that hampers our efforts.

Therefore, I ask the Commission to consider and enact regulatory reforms that will strengthen state parties and our role in our democracy.

Sincerely,

A handwritten signature in black ink that reads "Brad Martin". The signature is written in a cursive, slightly slanted style.

Brad Martin
Executive Director
Democratic Party of Oregon