



THE FEDERAL ELECTION COMMISSION

RECORD

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REPORTING INTERNAL COMMUNICATIONS BY CORPORATIONS, LABOR ORGANIZATIONS AND OTHER MEMBERSHIP ORGANIZATIONS

The Federal Election Campaign Act of 1971, as amended, allows communications by a corporation to its stockholders and executive or administrative personnel and their families, and communications by a membership organization (including a labor organization) to its members and their families on any subject. 2 U.S.C. §441b(b)(2)(A). The Act, however, requires the reporting of certain communication costs paid with corporate or membership organization funds if those costs exceed \$2,000 per election. 2 U.S.C. §431(9)(B)(iii). The reporting obligation applies to those communications which expressly advocate the election or defeat of a clearly identified candidate (partisan communications). Communications primarily devoted to subjects other than express advocacy of the election or defeat of a clearly identified candidate are not covered by this particular reporting requirement.

The \$2,000 threshold for reporting applies separately to each election process within a calendar year (i.e., all primary elections, the general election and any special or run-off elections). 2 U.S.C. §431(1)(A). Each corporation, each incorporated subsidiary and each State and local labor organization has a separate \$2,000 threshold. Therefore, each entity does not report until the threshold is reached.

Note: This particular reporting requirement is not applicable to "political committees" as defined by 2 U.S.C. §431(4).

What Form To Use

Corporations, labor organizations and other membership organizations required to file a report under these provisions should use either FEC Form 7 or a letter containing the same information.

What Must Be Reported

Each report filed under these provisions must include the following for each communication:

1. The type of communication (e.g., direct mail, telephone or telegram).
2. The class or category communicated with (e.g., members, stockholders or executive/administrative personnel).
3. The date(s) of the communication.
4. Whether the communication is in support of, or in opposition to, a particular candidate.
5. The name of the candidate, the office sought, the district and State of the office and whether the communication was for the primary or the general election.
6. The cost of the communication.

Note: In the case of a communication which advocates the election or defeat of more than one candidate, the cost should be allocated among the candidates according to the benefit they are expected to derive and should be reported accordingly.

When to Report

Organizations required to report under these provisions must file quarterly reports during a calendar year in which a regularly scheduled general election is held. In addition, a 12-day pre-general election report must be filed for activity in connection with any general election. Reports are required beginning with the first reporting period during which the aggregate cost for communications exceeds \$2,000 per election and for each period thereafter in which the organization makes any additional disbursements in connection with the same election. 2 U.S.C. §431(9)(B)(iii); 11 CFR 100.8(b)(4), 104.6 and 114.3.
(FEC Agenda Document No. 81-151)

For more information on reporting procedures, consult the instructions on FEC Form 7 or contact: Office of Public Communications, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, or call: 202-523-4068 or toll free 800-424-9530.

For statistics on communication costs, see p. 7.

REGULATIONS

FEC HOLDS HEARINGS ON CORPORATE/LABOR COMMUNICATIONS

On October 26, 1981, the Commission held a public hearing on possible revisions to Sections 114.3 and 114.4 of FEC Regulations, which govern partisan and nonpartisan communications that may be made by labor organizations and corporations (including incorporated trade associations, incorporated membership organizations, cooperatives and corporations without capital stock). During a full day of hearings presided over by Chairman John Warren McGarry, the Commissioners heard testimony from nine witnesses representing the following organizations (listed in order of their testimony): the National Soft Drink Association, the National Association of Broadcasters, the Washington Legal Foundation, American Bankcorp, Inc., the National Right to Work Committee and the AFL-CIO. Comments on nonpartisan communications ranged from suggestions to clarify the definition of "nonpartisan" communications covered by Section 114.4 to suggestions for modifying the conditions under which nonpartisan communications may be made. Comments on partisan communications included a suggestion that an organization be allowed to follow the rules for partisan appearances, even if a few nonsolicitable employees helped administer a meeting at which candidates or party representatives addressed the organization's solicitable class (i.e., its executive and administrative employees and members).

Prior to holding the public hearing, the Commission had received 42 written comments on possible revisions to Sections 114.3 and 114.4. The Commission will review these comments and testimony before drafting final proposed revisions to Sections 114.3 and 114.4.

Copies of the written comments may be obtained by contacting the FEC's Public Records Office at 202-523-4181 or toll free 800-424-9530.

LEGISLATION

HONORARIA LIMIT REPEALED

On October 1, 1981, Congress approved legislation repealing 2 U.S.C. §441i(a)(2), a provision of the election law* that had placed an overall \$25,000 annual limit on honoraria that a federal officeholder or employee could accept for speeches, appearances and articles (Pub. L. 97-51). The \$2,000 limit on individual honorarium payments continues to apply. The Senate Appropriations Committee had approved the repeal as an amendment to House Joint Resolution 325, an interim funding measure that provided continuing appropriations into Fiscal Year 1982 for federal programs without permanent funding.

* The Federal Election Campaign Act, as amended in 1979

OPINIONS

ADVISORY OPINION REQUESTS

Advisory Opinion Requests (AORs) pose questions on the application of the Act or Commission Regulations to specific factual situations described in the AOR. The following chart lists recent AORs with a brief description of the subject matter, the date the requests were made public and the number of pages of each request. The full text of each AOR is available to the public in the Commission's Office of Public Records.

AOR	Subject	Date Made Public	No. of Pages
1981-49	Contributions and expenditures made on behalf of state and local candidates by holding company of federally chartered savings and loan.	10/14/81	2
1981-50	Partnership's services to facilitate members' contributions to candidates.	10/22/81	4
1981-51	Volunteer services offered by foreign artist to candidate committee.	10/27/81	2

The RECORD is published by the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. Commissioners are: John Warren McGarry, Chairman; Frank P. Reiche, Vice Chairman; Joan D. Aikens, Thomas E. Harris; Vernon W. Thomson; Robert D. Tiernan; William F. Hildenbrand, Secretary of the Senate, Ex Officio; Edmund L. Henshaw, Jr., Clerk of the House of Representatives, Ex Officio. For more information, call 202/523-4068 or toll-free 800/424-9530.

ALTERNATE DISPOSITION OF ADVISORY OPINION REQUESTS

- **AOR 1981-31** (Property made available to candidate for use in fundraising raffle) was withdrawn by its requester on September 14, 1981.

ADVISORY OPINIONS: SUMMARIES

An Advisory Opinion (AO) issued by the Commission provides guidance with regard to the specific situation described in the AOR. Under the 1979 amendments to the Act, any person may request an AO on a specific activity which the person intends to undertake. The requester will not be subject to any sanctions under the Act if he/she acts in accordance with the opinion. Other persons may rely on the opinion if they are involved in a specific activity which is indistinguishable in all material aspects from the activity discussed in the AO. Those seeking guidance for their own activity, however, should consult the full text of an AO and not rely only on the summary given here.

AO 1981-37: Corporate and Union Purchases in Connection With Public Affairs Programs Featuring Congressional Candidate

Corporations and unions may purchase tickets and advertising in connection with a public affairs series that will be moderated by Congressman Richard A. Gephardt and sponsored by Delano Productions, Inc. (Delano). Since the major purpose of the programs is not to influence Congressman Gephardt's nomination or election, expenditures made by unions and corporations with regard to television and radio broadcasts (and rebroadcasts) of the series will not result in prohibited contributions to his campaign committee. The Commission expressly conditioned its approval of these expenditures on:

1. The absence of any communication expressly advocating the nomination or election of Congressman Gephardt or the defeat of any other candidate;
2. The avoidance of any soliciting, receiving or making of campaign contributions in connection with the series;
3. Delano's compliance with its stated intention not to sell political advertising for any broadcast or rebroadcast of the programs; and
4. Delano's adherence to guidelines mentioned in AO 1980-90 concerning the sale of transcripts and their use by corporations and labor organizations.

This opinion supersedes AOs 1975-8, 1975-13, 1975-20 and 1975-108, which held that speeches made by a candidate before a substantial number of the candidate's constituency would be considered an activity advancing his/her candidacy.* This opinion also qualifies AO 1977-31, which held that a corporation's employment of a candidate as an announcer constituted a contribution to his campaign.

The Commission expressed no opinion on the application of House Rules or the Communications Act (or related rules and regulations of the Federal Communications

Commission) to this activity since they are beyond the FEC's jurisdiction. Commissioner Joan D. Aikens filed a concurring opinion. (Date issued: October 13, 1981; Length: 6 pages, including concurring opinion)

AO 1981-38: Publication's Use of Information in FEC Reports

CAMPAC Publications (CAMPAC) may use information obtained from reports filed with the FEC in connection with the publication of a national newsletter covering the political campaigns of federal candidates. CAMPAC wants to use the names and addresses of candidates, campaign workers and consultants – but not contributors – to solicit information on campaigns and to build a subscription list.

To protect the privacy of individuals who make contributions, the Act and Commission Regulations place restrictions on the use of information disclosed in reports filed under the Act. The election law prohibits the use of information about individual contributors for purposes of soliciting contributions or for commercial purposes. 2 U.S.C. §438(a); 11 CFR 104.15(a). Although CAMPAC intends to use the information for commercial purposes, CAMPAC's use of information disclosed on FEC reports is permissible because its newsletter will not include information about individual contributors. In fact, CAMPAC plans to use information derived from FEC Schedule B, which itemizes expenditures. (This schedule does not contain information on individual contributors, except when a contribution has been refunded.) (Date issued: October 13, 1981; Length: 3 pages)

AO 1981-42: Consultant's Payment of Rental Fee for Equipment Used by Campaign

If Consulting Associates (Consulting), a campaign management and consulting corporation hired by the Fitzgerald for Congress Committee (the Committee), pays the rental fee for office machines used by the campaign, Consulting's payment might be considered a prohibited contribution to the Committee. Consulting entered into an agreement with the Committee to provide certain campaign services for an agreed price, plus expenses. Consulting and the Committee are currently in conflict as to which organization is liable for the debt incurred for the rental of the office machines. Under the following circumstances, payment of the debt by Consulting would result in a prohibited corporate contribution:

1. If Consulting was not obligated to pay the rental fee under the terms of its contract with the Committee, Consulting would be making a contribution in-kind to the Committee by paying the debt and allowing the Committee to use the equipment free of charge or at a reduced rate. 11 CFR 100.7(a)(1)(iii). Note, however, that if Consulting pays the debt as a result of a court judgment holding it liable for the rental fee, the payment would not be considered a contribution.
2. Apart from the issue of who is liable for the rental fee under the terms of the contract, Consulting would be making a prohibited contribution to the Committee if it treated the Committee differently from other clients in similar circumstances, i.e., if Consulting extended credit to the Committee for a period of time beyond

* The programs will be held in St. Louis, a city that is partially situated within Congressman Gephardt's Congressional district.

continued

"normal business practice" without making a "commercially reasonable attempt to collect the debt." 11 CFR 100.7(a)(4).

The Commission noted that it has no jurisdiction to determine each organization's obligations and rights under the contract. Such determinations are subject to relevant state law. (Date issued: October 13, 1982; Length: 3 pages)

AO 1981-43: Nonpartisan Get-Out-The-Vote Posters Sponsored by Trade Association PAC

The American Hotel & Motel Association Political Action Committee (AHMPAC), the separate segregated fund of a trade association, the American Hotel and Motel Association (AH & MA), may finance posters urging the general public to "Support The Candidate Of Your Choice." AHMPAC plans to distribute the posters to individual and corporate members of AH & MA, who will display them at their respective hotel properties.

Under Commission Regulations, the separate segregated fund of a trade association may finance communications directed to the general public, as long as the communications do not solicit contributions from individuals outside the trade association's solicitable class. 11 CFR 114.5(i). The poster AHMPAC plans to distribute is not considered a solicitation to AHMPAC because it will contain no reference to AHMPAC or AH & MA. Nor is the poster considered an expenditure because, although it will contain a picture of AH & MA's president, he is not a candidate for any federal office. Payments for the posters must nevertheless be reported by AHMPAC as general "disbursements." 2 U.S.C. §434(b)(4)(H)(v); 11 CFR 104.3(b)(3)(ix). Commissioner Frank P. Reiche filed a concurring opinion. Commissioner Thomas E. Harris filed a dissenting opinion. (Date issued: November 4, 1981; Length: 5 pages, including concurring and dissenting opinions)

AO 1981-44: Multicandidate Committee's Expenditures Advocating Candidate's Defeat

Expenditures made by the National Conservative Political Action Committee (NCPAC) for radio commercials that criticized Congressman Les Aspin's vote against President Reagan's tax program and advocated his defeat in 1982 do not constitute a "contribution" to Mr. Aspin or his campaign committee, the Friends of Les Aspin, even though NCPAC communicated with Mr. Aspin about the expenditures before making them. Accordingly, neither Mr. Aspin nor his campaign committee is required to report NCPAC's expenditures as "contributions" to Mr. Aspin's campaign. Nor are the expenditures subject to the dollar limits the Act imposes on contributions by multicandidate political committees.

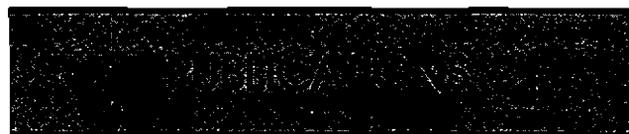
NCPAC had sent out a press release notifying Mr. Aspin and 13 other Congressmen that it planned to "alert voters" in their respective Congressional districts to the fact that "their Congressman is working against the Reagan tax cut." If the Congressmen chose not to support the Reagan tax cut, NCPAC informed them that it was "prepared to expose their records" through radio and direct mail campaigns. NCPAC would also run "additional, harder hitting com-

mercials." In a follow-up letter to Mr. Aspin, NCPAC offered to run a media campaign "applauding" him if he announced his support of the tax cut bill. Mr. Aspin subsequently announced that he would vote against the tax cut bill.

As defined by the Act, the funds NCPAC spent advocating Mr. Aspin's defeat do not constitute "contributions" to his campaign because:

- The campaign did not accept a gift or "anything of value" from NCPAC (2 U.S.C. §431(8)(A); 11 CFR 100.7(a)(1)); and
- Although NCPAC communicated with him, the expenditures did not aid the "... candidate in a manner indistinguishable in substance from the direct payment of cash..." 11 CFR 109.1(c). (See also, Conference Report on the FECA Amendments of 1976, H.R. Rep. No. 94-1057, 94th Cong., 2d Sess. 59(1976).)

Because Mr. Aspin lacked standing to ask the question, the Commission expressed no opinion on whether NCPAC's expenditures constituted contributions to other candidates who may oppose Mr. Aspin in a future campaign. 11 CFR 112.1(b). Moreover, the Commission expressed no opinion on the application of statutes outside its jurisdiction. (Date issued: November 9, 1981; Length: 3 pages)



SELECTED BIBLIOGRAPHY OF CAMPAIGN FINANCE LAWS AVAILABLE

During October 1981, the FEC's Library issued an updated edition of its *Campaign Finance and Federal Elections Bibliography*. The *Bibliography*, which is updated periodically, provides a selected, annotated compilation of publications issued from January 1977 through September 1981. Indices and data bases searched for bibliography entries included the *Reader's Guide to Periodical Literature*, the *Index to Legal Periodicals*, the *Current Law Index*, the *Social Science Periodical Index*, the *Social Sciences Citation Index* and the Library of Congress' computerized file of current periodical holdings. Entries are listed according to four information categories:

- Part I: Legislative history of the Federal Election Campaign Act from 1971 through the passage of the 1979 amendments (Pub. L. 96-187).
- Part II: Books, monographs, treatises and studies.
- Part III: Manuals, guidebooks, reference services and search tools.
- Part IV: Law review articles and articles from business, political science and general periodical indexes.

Copies of the *Campaign Finance and Federal Elections Bibliography* are available for review and copying in the FEC's Office of Public Records. Requests for the *Bibliography* should be accompanied by a money order or check for \$2.00 payable to the U.S. Treasurer, and sent to the FEC's Office of Public Records.

CANDIDATES RUNNING FOR MORE THAN ONE OFFICE

If a candidate is running for more than one federal office, must he or she maintain separate campaign organizations?

Yes. A candidate must establish completely separate campaign organizations. For each office sought, the candidate must file a Statement of Candidacy (FEC Form 2), designating a separate principal campaign committee. Within 10 days after the candidate designates a principal campaign committee, its treasurer must file a Statement of Organization (FEC Form 1) for that committee. 11 CFR 110.8(d)(1).

Do these procedures apply to an individual who is a candidate for both a federal and a state office?

Yes. Separate campaign organizations must be established, but only the candidate's federal campaign committee is required to register and report under the Federal Election Campaign Act.

May an individual contribute to each campaign of a candidate running for more than one federal office?

Yes. An individual may contribute up to \$1,000, per election, to each of the candidate's campaigns, provided he or she clearly designates in writing the campaign for which the contribution is intended (e.g., Senate primary campaign). 11 CFR 110.1(f).

May the committees of a candidate who is actively campaigning for more than one federal office share personnel and facilities?

Yes, provided none of the campaigns receives Presidential public funds and provided that the campaigns allocate the expenditures between them. 11 CFR 110.8(d)(3).

May a candidate who is actively campaigning for more than one federal office transfer funds, goods or services between campaign organizations?

No. 11 CFR 110.8(d)(2).

Once a candidate has decided to campaign actively for only one office, may funds then be transferred from the inactive campaign to the active one?

Yes, provided three conditions are met:

1. One of the campaigns must officially become inactive by either filing a termination report with the FEC (or other appropriate office)* or by notifying the appropriate office that the candidate and his/her authorized committees will no longer make expenditures, except to retire debts. 11 CFR 110.3(a)(2)(v)(A).
2. The candidate has not received any Presidential public funds. 11 CFR 110.3(a)(2)(v)(C).

* The notice of termination should be filed with the Clerk of the House, the Secretary of the Senate or the FEC, as appropriate. 11 CFR Part 105.

3. The treasurer of the active campaign committee must ensure that the transfer will not cause a contributor to exceed his/her limits for the candidate's active campaign. 11 CFR 110.3(a)(2)(v)(B).

How can the treasurer ensure that transfers from the inactive committee will not result in excessive contributions to the active committee?

The treasurer may do this by examining funds transferred from the inactive committee on a "last in, first out" basis. For example, if \$6,000 in contributions is transferred from the inactive committee, the treasurer should identify each contribution making up the last \$6,000 in contributions received by the inactive committee. A contribution should be excluded from the transfer if it causes a contri-

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PUBLIC RECORDS ACCESSIBLE TO HISPANIC AND HANDICAPPED PERSONS

In order to encourage public disclosure of campaign finance records, the Federal Election Commission has made a concerted effort to make the Public Records Office accessible to as many persons as possible, including Hispanics and the physically handicapped.

For Hispanic visitors, a staff member fluent in Spanish is available for assistance.

Staff are also available to assist handicapped persons in locating, reviewing, copying and understanding campaign finance reports, computer indexes and other FEC documents. For visitors with hearing impairments, staff will provide literature that explains what information is available and write out responses to questions.

For visitors who are visually impaired, the Public Records Office makes available visual aids, such as stationary page magnifiers and hand-held magnifying glasses. Zoom lenses on the microfilm machines used to review and copy documents also magnify information. On request, staff will also prepare cassettes of campaign finance information for visually impaired persons living outside the Washington, D.C. area.

The Commission's offices at 1325 K Street, N.W., Washington, D.C. 20463, are located within one and a half blocks of Metro bus lines and the McPherson Square Metro subway stop (blue line). The Public Records Office is on the ground floor of the building. All entrances are barrier-free, and restrooms are equipped for the handicapped.

butor to exceed his/her \$1,000 limit when added to a contribution made by the same donor to the active committee. See the procedures spelled out in Section 110.3(a)(2)(v)(B) of Commission Regulations.

REPORTING BY AUTHORIZED CANDIDATE COMMITTEES

How should an authorized candidate committee (other than the principal campaign committee) file its campaign finance reports?

The authorized committee must file its reports with the candidate's principal campaign committee. The principal campaign committee, in turn, files the reports (together with its own reports) with the appropriate state and federal offices. In addition, the principal campaign committee files an FEC Form 3Z, consolidating its own receipts and disbursements with those reported by any authorized committee(s). 11 CFR 104.3(f) and 108.1.



SUPREME COURT DENIES CERT IN *FEC v. MACHINISTS NON-PARTISAN POLITICAL LEAGUE AND CITIZENS FOR DEMOCRATIC ALTERNATIVES IN 1980*

On October 13, 1981, the Supreme Court denied a petition for a writ of *certiorari*, which the Commission had filed on June 9, 1981, in two subpoena enforcement actions, *FEC v. Machinists Non-Partisan Political League* and *FEC v. Citizens for Democratic Alternatives in 1980*. The Commission's petition sought review of decisions issued by the U.S. Court of Appeals for the District of Columbia Circuit on May 19, 1981. In overturning the district court's orders enforcing subpoenas the Commission had issued to the defendants, the appeals court found that the Commission "lacked subject matter jurisdiction over the . . . activities it sought to investigate." (For a detailed summary of the appeals court's decision in the cases, see the July 1981 *Record*, p. 5.)

FEC WITHDRAWS APPEAL OF PHILLIPS PUBLISHING, INC. SUIT

On October 30, 1981, the U.S. Court of Appeals for the District of Columbia Circuit granted the FEC's motion to withdraw its appeal of *FEC v. Phillips Publishing, Inc.* (Civil Action No. 81-2015). In a motion filed on October 21, 1981, the Commission stated that it was withdrawing the appeal "in the interest of judicial economy," but that it continued to believe "the district court's decision was erroneous." On July 16, the district court had denied the FEC's petition for court enforcement of two subpoenas against Phillips Publishing, Inc. The FEC had issued the

subpoenas as part of an investigation into a complaint filed by the Kennedy for President Committee in March 1980. For a detailed summary of the district court's opinion, see page 2 of the September 1981 *Record*.

NEW LITIGATION

Kennedy for President Committee v. FEC

Plaintiff asks the district court to declare that the FEC violated the Government in the Sunshine Act (5 U.S.C. §552b) by:

1. Considering the final audit report on Senator Edward Kennedy's Presidential primary campaign in executive sessions; and
2. Failing to indicate in public notices of the executive sessions that the FEC would consider plaintiff's audit report.

Plaintiff asks the court to enjoin the FEC from further violations of the public notice provisions of the Government in the Sunshine Act, and from continuing to review audit reports in closed sessions.

Plaintiff further asks the court to order the FEC to make available to the Kennedy campaign and the public a tape recording or written transcript (as well as any other documents) pertaining to the FEC's discussion of the audit report at the executive sessions.

(U.S. District Court for the District of Columbia, Civil Action No. 81-2552, October 21, 1981)

CHANGE OF ADDRESS

Political Committees

Registered political committees are automatically sent the *Record*. Any change of address by a registered committee must, by law, be made in writing as an amendment to FEC Form 1 (Statement of Organization) and filed with the Clerk of the House, the Secretary of the Senate or the FEC, as appropriate.

Other Subscribers

Record subscribers (who are not political committees), when calling or mailing in a change of address, are asked to provide the following information:

1. Name of person to whom the *Record* is sent.
2. Old address.
3. New address.
4. Subscription number. The subscription number is located in the upper left hand corner of the mailing label. It consists of three letters and five numbers. Without this number, there is no guarantee that your subscription can be located on the computer.

AUDITS

AUDITS RELEASED TO THE PUBLIC

The Federal Election Campaign Act, as amended (the Act) gives the Commission authority to audit campaigns of all Presidential candidates who receive public funds and the campaigns of other political committees. Final audit reports are available to the press through the Press Office and to the general public through the Office of Public Records. The following is a chronological listing of audits released between September 28 and November 9, 1981.

Audit	Date Made Public
1. Kennedy for President Committee (Final Audit Report of the Primary Campaign)	9/28/81
2. Republican State Central Committee of Iowa and its Finance Committee	9/28/81
3. National Unity Campaign for John Anderson (Final Audit Report of the General Election Campaign)	10/19/81
4. Carter/Mondale Presidential Committee, Inc. (Addendum to the Final Audit Report for the Primary Campaign)	11/9/81

STATISTICS

INTERNAL COMMUNICATION COSTS REPORTED BY LABOR ORGANIZATIONS AND CORPORATIONS

Labor organizations, corporations and membership groups reported spending \$3.9 million during 1979-80 for internal, partisan communications related to federal elections, according to a statistical study released by the FEC in October 1981. Of the total reported, labor organizations spent close to \$3 million, membership groups spent approximately \$1 million and the sole corporation reporting these expenditures spent less than \$4,000.

The election law allows corporations, labor organizations and membership groups to finance internal communications that expressly advocate the election or defeat of federal candidates. In the case of corporations, these

partisan communications may be directed only to stockholders, executive and administrative personnel and their families. Membership groups may direct these communications only to individual members, individual representatives of member corporations and the organization's executive and administrative personnel and their families. Labor organizations may make partisan communications only to members and their families. Disbursements for "communication costs" may be made in addition to the contributions and independent expenditures made by the separate segregated funds (political action committees or PACs) of these groups. Communication costs must be reported when they exceed \$2,000 per election. (See reporting procedures on p. 1.)

In the 1979-80 election cycle, a total of 62 groups, including 57 labor organizations, four membership groups and one corporation reported "communication costs." Eighty percent was spent advocating the election of candidates; twenty percent was spent advocating their defeat. By contrast, communication costs reported in the 1977-78 election cycle totaled approximately \$313,000. In 1976, 71 groups, mostly labor organizations, reported spending \$2.1 million.

A comprehensive statistical study of these expenditures, the *FEC Index of Communication Costs for 1979-80*, is available for \$5 from the Public Records Office, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. Or call: 202-523-4181 or toll free: 800-424-9530.

Chart I below lists the 10 groups that reported spending the most money on communication costs during 1979-80. Chart II lists the 15 candidates for or against whom the most communication costs were reported.

CHART 1

Organization	Total Communication Costs
National Rifle Association	\$ 803,839
American Federation of State, County & Municipal Employees	532,538
AFL-CIO	441,064
UAW	402,280
United Steelworkers of America	209,512
National Education Association	183,636
Chamber of Commerce of the U.S.	158,650
Ohio AFL-CIO	149,439
Communication Workers of America	91,475
International Union of Bricklayers & Allied Craftsmen	85,555
Grand Total	\$3,057,988

CHART II

Candidate	Total Communication Costs	Costs Advocating Election	Costs Advocating Defeat
Presidential			
Jimmy Carter (D)	\$1,636,394	\$1,510,925	\$125,469
Edward Kennedy (D)	598,577	443,077	155,500
Ronald Reagan (R)	318,914	64,784	254,130
John Anderson (I)	60,003	—	60,003
Edmund G. Brown, Jr. (D)	23,284	23,284	—
Senatorial			
Birch Bayh (D-IN)	\$ 44,770	\$ 44,292	\$ 478
John Glenn (D-OH)	39,093	38,551	542
Donald Stewart (D-AL)	28,256	28,256	—
Gaylord Nelson (D-WI)	27,989	15,094	12,895
Charles McC. Mathias (R-MD)	25,309	25,061	248
House			
Les Aspin (D-WI)	\$ 20,642	\$ 20,642	\$ —
Robert Kastenmeier (D-WI)	18,485	16,699	1,786
Edward P. Beard (D-RI)	16,484	15,804	680
Frank Thompson, Jr. (D-NJ)	15,510	15,285	225
Royden P. Dyson (D-MD)	12,323	4,154	8,169

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