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AGENDA ITEM

For Meeting of: _//-05-0 9_

SUBMITTED LATE

To: The Commission

From: Steven T. Walther
        Chairman

Date: November 5, 2009

Re: Status of Website and Internet Communications Improvement Initiative

The Federal Election Commission's website has become the Commission's primary vehicle for sharing information with the public, such as campaign finance disclosure data, educational materials related to Federal campaign finance laws, information concerning the development and implementation of new rules and regulations, advisory opinions, and closed enforcement actions. Accordingly, the FEC's website, and how the Commission uses the Internet to disclose information to the public, is critical to the Commission's mission.

Recently, the Commission adopted an initiative seeking public comment on how to improve all aspects of how the Commission discloses information to the public on its website and through the use of Internet communications. As part of these efforts, on July 21, 2009, the Commission published a notice of public hearing and request for public comments in the Federal Register. In response to the Federal Register notice, the Commission received numerous written comments from the public. The Commission also held two hearings, on July 29, 2009 and August 25, 2009, and heard oral testimony from 15 witnesses, including attorneys specializing in campaign finance law, open government organizations, software developers, and representatives from other Federal government agencies. The transcript from those hearings and documents related to the Commission's Website and Internet Communications Improvement Initiative are available at http://www.fec.gov/pages/hearings/internethearing.shtml.

The Commission is carefully considering all suggestions submitted so far as part of this initiative. Part I of the enclosed document lists the individuals and organizations that submitted written comments or provided oral testimony at the Commission's public hearings. Part II lists the Commission's Information Technology projects that are currently in development, summarizes the public comments that relate to each project, and briefly describes FEC actions taken in response to such comments. Part III summarizes public comments that are not associated with any Information Technology projects in development at this time. The Commission is carefully considering these comments and plans to announce additional projects to improve its website and Internet communications in the upcoming months.

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Gloria Andersen, 2004 U.S. House candidate

Jan Baran, Wiley Rein LLP

Robert Biersack, Special Assistant to the Staff Director for Data Integration, Federal Election Commission

Jonda Byrd, Chief of Policy and Program Management Branch, U.S. Environmental Protection Agency

Center for the Study of Elections and Democracy, submitted by David B. Magleby, Stephanie Curtis, David Lassen, and Brad Jones

Jose Cruz

Matt DeBergalis, Chairman and Founder, ActBlue

Martha Dorris, Acting Associate Administrator of the Office of Citizen Services and Communications, U.S. General Services Administration

Kenneth Doyle, Senior Editor, *BNA Money & Politics Report*

Craig Engle, Arent Fox LLP

Erik Engquist, Reporter, *Crain's New York Business*

Arnold Felberbaum, Reed Elsevier

Funk4Crunk

Laurence Gold, Lichtman, Trister & Ross, PLLC

Jeremiah Gray

Susan Grupe, Director of Administration, ALLERPAC – Joint Council of Allergy, Asthma & Immunology

Edward Hamilton, 2010 U.S. Senate candidate

Paul Houghtaling, President, Political CFOs, Inc.

Jennifer Jaketic, Director, National Association of Broadcasters Political Action Committee

Bev Jeskie, International Pizza Hut Franchise Holder's Association

Clay Johnson, Director of Sunlight Labs, The Sunlight Foundation

Kalstl

Kinde Durkee, Treasurer, Durkee and Associates LLC, by Laurence Zakson, Reich, Adell & Cvitan

Elizabeth Kingsley, Harmon, Curran, Spielberg & Eisenberg, LLP

Sheila Krumholz, Executive Director, Center for Responsive Politics

Ellen Kuo

Diane Lenning

Los Angeles County Democratic Central Committee, by Laurence Zakson, Reich, Adell & Cvitan

Bernie Lubran, Regional Manager, ForeSee Results, Inc.

Theresa McGrath

Michael Malbin, Executive Director, Campaign Finance Institute

Ann Markel, Manager, Veterans of Foreign Wars Political Action Committee

Lawrence Norton & James Kahl, Womble, Carlyle, Sandridge & Rice, PLLC

Nathaniel Pearlman, Founder, NGP Software, Inc.

Patricia Peay

Lori Peterkin, Operations Manager, Bingaman Campaign

George Phillies

Kim Piker, Finance Director, Bob Filner for Congress

Anne Rosenthal

William Roth, Catholic Democrats PAC

Chris Rye, Treasurer, American Liberty Coalition

Matthew Sanderson, Caplin & Drysdale, Chartered

Brian Svoboda, Perkins Coie LLP

Michael Toner, Bryan Cave LLP

Anna Wagner, Eastman Chemical Company

Lisa Welchman, Founding Partner, Welchman Pierpoint

Darrell West, Vice President and Director of Governance Studies, The Brookings Institution

II. COMMENTS ASSOCIATED WITH ONGOING
INFORMATION TECHNOLOGY PROJECTS

A. Disclosure Portal

1. Data presentation and application programming interfaces (APIs) for Federal campaign data

Recommendations:

Clay Johnson - The FEC should develop an API (Application Program Interface) that will allow programmers to interact with FEC data. End-users of outside websites should be free to use the FEC's APIs to obtain, display and reuse FEC data in their own applications. The technologies adopted should not be complicated or proprietary, nor should they be likely to become quickly outdated. Sunlight recommends XML and JSON as well as a REST-based API for search queries because these technologies, along with open standards, are likely to result in web services that are easy to consume and that will not be quickly outdated.

Michael Malbin - XML/JSON/API would be useful to many people, but introducing the new formats should not mean discarding the old. It is important to maintain backward compatibility.

William Roth - Provide open-source public APIs so that other online websites can download the data. Make sure these are in the most popular programming languages, like PHP, Java, C#.

FEC action:

The Commission is developing ways to provide direct access to programs the Commission uses to assemble and display campaign finance information for specific candidates and races. This "computer-to-computer" communication allows others to create presentations of campaign finance material that may be updated automatically when new information is reported. Specific projects include API/web service to show common sets of Federal campaign data including an API to show summary contribution information on a candidate for indicated cycle and an API to show summary contribution information on a PAC or Party for indicated cycle. The Commission is developing new formats for downloading data files. The Commission recently launched a disclosure data catalog page, a disclosure data weblog, bundled contributions, leadership PACs and sponsors, lobbyist/registrant committees.

Estimated completion date: First operational example by December 13, 2009; and data catalog completed October 26, 2009.

2. New formats for data downloads

Recommendations:

Center for the Study of Elections and Democracy, Brigham Young University - When downloading data, it is not always clear how the different fields in the databases were constructed.

Matt DeBergalis - The Commission has a clear opportunity to define standard formats for disclosure data and standard protocols for the transmission of disclosure data. Naturally, these standards should build on modern software engineering best practices. Any new website and disclosure toolkit should accept incoming disclosure data in these formats, and provide canonical disclosure data to the public using them. Two formatting standards would be particularly valuable: a standard XML representation of campaign finance events, committee records, and communications between the Commission and committees; and an XHTML microformat standard appropriate for use in an interactive website. Microformats are particularly well-suited for committee records and contribution and expenditure data. A successful microformat standard would allow both generic and purpose-built search engines to easily index disclosure data, offering an end-run around many of the search challenges the Commission raises in its request for proposal.

Erik Engquist - Reporters need to download data in spreadsheet format, and need to be able to search by date range and by contribution level.

Jennifer Jaketic - PDFs (and HTML formats, which, on the FEC website, are exactly the same as the PDFs) of the exact layout of reports are difficult to maneuver online. Committees want to be able to find information quickly and should not have to look at an entire report to get that information. Something similar to an Excel format (but not able to be altered), with all the information in a more compact and easy-to-read layout, would make more sense. *The Record* should also not be a PDF of the exact document. Its current setup makes it difficult to skim, especially with multiple columns on each page. The format should be altered so that it reads like a normal web page. It would be helpful to include summaries next to each volume number (such as one bullet per topic covered).

Clay Johnson – The Commission could further improve access to its raw data by replacing formats currently used with formats such as JSON, XML or SQL as well as a REST based API for search queries. These technologies, along with open standards, are likely to result in Web services are easy to consume and that will not be quickly outdated.

Beth Kinsley – It would be helpful if the Campaign Guides could be offered in HTML format with revisions made directly to the affected sections as changes

occur. This would eliminate the need to have to check two sources every time a guide is used and potentially lead to improved compliance.

Theresa McGrath – Provide alternative formats for downloading than PDFs.

Michael Malbin - Even though entering expenditure data may be prohibitive for Senate paper filers, the Commission should make available House, Presidential and PAC expenditure files. Independent expenditures are available as part of existing files, but the Commission should provide a separate file with all independent expenditures by party committees, non-party committees and individuals.

Michael Malbin - The Commission should eventually move away from COBAL ("antiquated programming language, especially as programmers retire").

Ann Markel - Candidate and Committee master files should be more easily accessible and user friendly. They need to be in a printer friendly format, and perhaps even combined into one file.

Nathaniel Pearlman - The Commission should improve their data architecture. With respect to reports available on the FEC website (or FTP site), the file formats for summary and detailed report data look like they have not been much updated since the 1980s, and are difficult for lay people to understand. A simple upgrade to a CSV format would make that data far less cumbersome to work with, and far more accessible to the public.

FEC action:

The Commission has developed ways to provide FEC data in new formats rather than fixed-width text files currently available. The new formats are more flexible and compatible with the current generation of software used for display and analysis of information. This includes new formats for the disclosure data catalog, disclosure data weblog, bundled contributions, leadership PACs and sponsors, lobbyist/registrant committee Statements of Organization, candidate financial summaries, PAC financial summaries, and closed Administrative Fine Program cases.

Completed: October 26, 2009

3. Automated notification of updates/RSS

Recommendations:

Clay Johnson - Make RSS feeds available for new content, including new committees, new candidates and new campaign finance filings. All search queries should provide a permanent RSS feed that can be used to syndicate the results to

other clients. End users must have the ability to link to search results in emails and other websites.

Nathaniel Pearlman - It would be helpful to enable automatic notifications or RSS feeds of information about specific committees.

William Roth - Allow the syndication of reporting data through RSS.

Darrell West - RSS feeds for information customization (updates on particular candidates or political action committees).

FEC action:

The Commission developed automated notification of updates that permit users to sign up for electronic updates when specific information they are interested in has been updated.

Completed: October 26, 2009

4. Search current data for detailed receipts and disbursements

Recommendations:

Matt DeBergalis - A successful microformat standard would allow both generic and purpose-built search engines to easily index disclosure data, offering an end-run around many of the search challenges the Commission raises in its RFP.

Craig Engle - Similar to the donor disclosure database, the creation of a searchable database listing all persons, vendors or organizations receiving funds from each reporting entity would be useful. A database of this nature would allow for much greater transparency into the use of political donations. This would allow donors the ability to gain a general understanding of the types and levels of expenses an organization or campaign is incurring. Subsequently, it would also provide political organizations with another reason to monitor its spending knowing a complete breakdown of its disbursements are readily available.

Paul Houghtailing - The primary focus on searchable data has been on the side of contributions. It would be helpful if individuals could search the database of disbursements as well. It would be helpful if an individual could sort the list of reports by date, reporting period, etc. The Commission should combine the two areas in which an individual can search for reports (report images Adobe format or reports downloaded in raw data format) and give them an option as to the way in which they are listed, as well as the format in which they would like to view/download the information.

Michael Malbin - Sorting expenditures may be problematic because candidates assign expenditures to categories based on their own judgment.

Michael Toner - The Commission should consider expanding the disclosure database to include a search engine for operating expenditures.

FEC action:

The Commission is expanding the disclosure database to include searchable expenditures by search terms such as address or name of payee, purpose of disbursement, or date of disbursement.

Estimated completion date: February 17, 2010

5. Portal entry page/special pages for different audiences

Recommendations:

Center for the Study of Elections and Democracy - Many of the proposed changes are on the right track, especially a proposal to provide portals on the homepage for individuals depending on what type of user they are. These portals would include areas for academics, campaign officials, and the general public. Each portal would emphasize a different set of analysis tools and datasets that would most likely be useful for the individual.

Arnold Felberbaum - The current website appears to have evolved over time and as more information was made available. Consider the constituencies that utilize the website and segmenting the landing page to those particular markets such as consumer, campaign committees, private sector, and public sector. Personalize the experience according to your audience.

Laurence Gold – The Commission should organize the website more on the nature of the material than on particular audience segments.

Michael Malbin - Once you get past the first step, users have overlapping information needs. The Commission should stick with a subject-based classification, but supplement it with a prominent tab that would take users to a page explaining the website to new users.

FEC action:

As part of its effort to improve the utility of the website, the Commission is exploring different entry page designs for different audiences or users of the FEC website (*e.g.* committee treasurers, reporters) to provide the most useful tools from the website presented to each type of audience.

Estimated completion date: June, 2010

6. Election dates and information

Recommendations:

Ellen Kuo –Provide a constantly updated template of the primary and general election dates by State. Show a clear linkage of a member's personal campaign to his or her leadership PAC.

Michael Malbin – The Commission should integrate election results with campaign finance data.

Michael Malbin - There should be a central election website for voters: a single place where a voter could enter an address and find out about polling places and hours, along with campaign finance and other information about Federal, State and local districts and candidates.

FEC action:

The Commission is preparing a comprehensive, State-by-State elections map that will include election dates and other important information such as links to relevant State agencies.

Estimated completion date: January, 2010

B. Website Usability

1. Website content/language changes

Recommendation:

Clay Johnson - The FEC could further improve its website by undertaking a review of the language on the site and defining, revising or rewriting it in a manner a lay-user can understand.

Sheila Krumholz – Center for Responsive Politics heartily supports making the FEC site more user-friendly, including changes to put terminology "into English," so to speak. Where technical or legal language must be used for a complete and precise understanding of key terms, the FEC should use it—but it should consider adding a more streamlined version of the information as well. And wherever simpler terms could be used *in place of* technical jargon without jeopardizing the necessary understanding of the information, those more basic terms should be used instead.

Michael Malbin - There ought to be frequently asked questions across the board, with simple, plain language explanations. But the problem is not only about "plain language." The problem primarily is about organization, which in turn is a problem about the definition of "users."

Lawrence Norton/James Kahl – As a general matter, the website should be organized from the perspective of a member of the public who is not already familiar with the functions and jargon of the Commission. In this regard, the homepage of the Commission's website could be substantially improved to guide website visitors to available information.

Nathaniel Pearlman – The FEC should make the FEC's website more user-friendly, employing plain language and updated technologies.

FEC action:

The Commission is reviewing website content to replace technical and legal language with plain English wherever possible.

Estimated completion date: February 1, 2010

2. Global website navigation

Recommendations:

Center for the Study of Elections and Democracy, Brigham Young University - The current website design requires several clicks to access desired information.

Center for the Study of Elections and Democracy, Brigham Young University - Once a good design and layout is found, we recommend that it be changed rarely. It is often frustrating when organizations change their websites too often because users have to learn the site's layout all over again.

Jose Cruz - It is difficult to do legal research on the Commission's website. A "Frequently Asked Questions" section would be incredible helpful.

Craig Engle - The Commission should improve the utility of the information disclosed on its website through the use of hyperlinks to additional documents, such as providing hyperlinks to previous advisory opinions cited within later opinions.

Jennifer Jaketic – Items such as the congressional primary dates and current contribution limits should be a lot more accessible. In order to find this information now, users have to use the search engine, which needs improvement as well. There should also be an icon or some other way to notify committees that

the congressional primary dates are now available. This information is vital for making contributions during an election year.

Clay Johnson - The navigation on the FEC's site is cumbersome, confusing and should be restructured to be more intuitive to casual users. Currently, there are menus on three sides of the site, and dropdown menus appear when a user rolls over the buttons on two of the sides. In addition, when a user resizes the browser window, the search box disappears behind the menu leaving users searching for a primary navigation tool.

Clay Johnson - The average user wants to view candidate profiles and information about who is making campaign contributions to which candidates. The Commission's homepage should make clear that such information is available.

Clay Johnson - The homepage should prominently feature buttons that enable users to quickly access key information about candidates, and replace the scrolling text with a "What's New" section to highlight current or new information.

Clay Johnson - The Commission should maintain its interactive maps (dynamic and user-friendly), but creating visualizations should come second to the FEC's primary mission of making as much basic data available to the public in a timely manner.

Beth Kingsley - As a simple navigational aid, repeating the key links on the toolbar to the left that is on the homepage would make it easier to get around the site without having to return home before finding a different section.

Beth Kingsley - An improved FAQ section would be helpful.

Beth Kingsley – Renaming homepage links and providing more explanation with each about what they provide, would be helpful.

Ellen Kuo - Show most frequently used items up front on the homepage.

Diane Lenning - Make the candidate forms have access from the homepage. Forms are what candidates are interested in and have to access regularly for reports.

Michael Malbin - The Commission should provide better explanations geared for the lay user on all of the content pages. The Commission should also provide a "contact us" page, and a specific "contact us" method on every page (either an email address or an online form) for user comment including the reporting of errors.

Michael Malbin - The Commission should include links to Statutes at Large and the U.S. Code (with key words and links) so that users may access statutes that make up the amendments to FECA.

Michael Malbin - There ought to be frequently asked questions across the board, with simple, plain language explanations. But the problem is not only about "plain language". The problem primarily is about organization, which in turn is a problem about the definition of "users".

Michael Malbin - The Commission should disaggregate information in campaign guides and offer links to build part of the FAQs.

Lawrence Norton/James Kahl – The homepage should present some basic options for locating certain categories of records. For instance, it would be helpful if a website visitor could click on a "Search FEC Records" button and be presented with the option of searching advisory opinions, closed enforcement files, litigation documents, etc. As currently configured, one would already have to know what categories of documents exist and that use of the general search function will not disclose documents contained in the Advisory Opinion Search System or Enforcement Query System. The availability of litigation documents is even more obscured because there is no tab on the homepage for "litigation" or obvious path to find documents relating to pending and closed litigation. One can find those documents by clicking on "law and Regulations," a link that one might reasonably assume contains only statutes, regulations, and Commission policy statements.

Lawrence Norton/James Kahl - The "What's New" button on the homepage, due to its size, color and location, is easily overlooked.

Nathaniel Pearlman - The FEC website is unquestionably difficult to navigate. Basic functions like finding forms and finding and using search interfaces should be redesigned.

Lori Peterkin – Provide a "contact us" link in the reporting and compliance section.

Brian Svoboda - The website can often be difficult to navigate through. For example, the Commission's library page should be easier to find. The Commission's website relies on multiple layers of tabs, which favors users who know exactly what they are looking for and where to find it.

Brian Svoboda - The Commission should consider providing more intuitive links, such as audio files of open meetings to the rulemaking pages, audit pages.

Brian Svoboda - The Commission should provide links to opinions, orders and pleadings of litigation documents. The older cases are only represented by the abstracts published in the FEC Record.

Brian Svoboda - The Commission should exercise care in using the homepage to publicize current events.

FEC action:

The Commission is beginning a comprehensive review of the website, involving staff from throughout the Commission along with outside users of FEC information in order to build an efficient and intuitive navigation that will improve access to existing Commission information.

Estimated completion date: June, 2010

3. Multimedia

Recommendations:

Laurence Gold – The Commission's educational programs are not reasonably accessible, for resource or travel reasons, to many who might benefit from them. The Commission should explore the utility of webinars and other electronically-based means to inform and train committees and groups in an interactive manner.

Sheila Krumholz – The Commission should retain the direct public outreach and user-friendly emphasis that it has begun with items like maps. Pod casts, RSS feeds and APIs are a logical extension of that.

Michael Malbin - The Commission should provide video recordings of Commission meetings, because it is difficult to identify speakers on audio.

Michael Malbin - The Commission should make video recordings of training sessions.

Brian Svoboda – The Commission would benefit from expanded uses of multimedia. Posting audio of Commission open meetings was a welcome development. The Commission might also make available streaming video of its conferences, and live streaming audio of its open meetings.

Michael Toner – Posting audio or video recordings as well as other conference materials on the Commission's website would be extremely valuable for representatives of those political committees that are not able to attend the conferences.

Darrell West – The Commission should webcast Commission hearings.

FEC action:

Currently, the Commission provides recorded clips of its open meetings on the FEC website. The Commission has developed live audio feeds of public Commission meetings. The Commission is developing the use of additional multimedia, including audio and video of Commission meeting and conference sessions.

Estimated completion date: live audio feeds completed as of November 4, 2009; streaming videos TBA.

4. Web analytics measurement

Recommendations:

Arnold Felberbaum - Instrumentation of the Website is essential for gathering statistics that can drive improvements in design. Several products (Unica, WebTrends and Ominture) provide insight into the utilization of a website. The Google Analytics tool does provide some of this information but may not be able to peer into the depth of the website and produce the statistical information necessary. Multi variant testing capabilities can also be purchased from various e-Commerce vendors. These tools are incredibly powerful and will truly allow you to understand what your audience likes/dislikes. Although the FEC cannot utilize cookies, consideration should be given to a "login" facility where repeat or high utilization users could perform some level of customization based on their ID with the Commission saving those parameters. It is functionality that should be evaluated, personalization will allow you to better accommodate your user base.

William Roth - Include analytics (like Omniture or Google Analytics) in your pages so you can see how the data is being used.

FEC action:

The Commission is evaluating tools that will help the Agency better understand how the FEC website is currently used. This better understanding would enable the Commission to implement the most useful improvements in content and navigation.

Estimated completion date: June, 2010

5. FEC blog

Recommendations:

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Michael Malbin - The Commission should host blogs to facilitate a conversation about the substance and techniques used by staff to disclose campaign finance data. The Commission should not host blogs for other user groups.

FEC action:

The Commission launched the FEC blog on October 26, 2009. This blog serves as a means to support interaction and collaboration with the users of the FEC website.

Completed: October 26, 2009

C. Legal Systems Integration and Improvement

1. Administrative Fine Program integration with Enforcement Query System

FEC action:

The Commission will complete its project to integrate all Administrative Fine Program documents into the Enforcement Query System.

Estimated completion date: November 27, 2009

2. Advisory Opinion Search System

Recommendations:

Jan Baran – The Commission should improve the Advisory Opinion Search System by allowing users to go to any year and link to a specific advisory opinion, allowing users to copy/paste into an email the link of a particular advisory opinion, and providing larger font/print format.

Jan Baran – The Commission should provide more links, particularly with respect to State campaign finance informational websites.

Laurence Gold – The Commission should provide documents relating to advisory opinions dating from the beginning, at least in the manner now available for advisory opinions in recent years.

Beth Kingsley – Further improving the onsite search should be a priority. For instance, add a feature where one can search by the section of the statute or regulations addressed by an advisory opinion.

Michael Malbin - The Commission should include pending AOs in the advisory opinion database.

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Matthew Sanderson – Add a "locate in result" function to the Advisory Opinion Search System that would allow users to comb through an initial search's results.

Brian Svoboda - The Commission should keep adding to the AO database, such as adding hyperlinks to audio files for each advisory opinion.

Michael Toner - The Commission should make all of the documents relating to advisory opinions available online as soon as practicable, particularly concurring and dissenting opinions.

Laurence Zakson – The search function could be greatly improved by introducing a "tagging" system for advisory opinions. If coupled with an indexing system, particularly an indexing system using the same terms as are used in the index to the Code of Federal Regulations, the Advisory Opinion Search System would become a more effective research tool.

FEC action:

The Commission is making improvements to the Advisory Opinion Search System by including more historical information, integrating all background material (*e.g.* requests, comments, concurring and dissenting statements), and improving the existing search capabilities.

Estimated completion date: November 27, 2009

3. Adding all Matters Under Review (MUR) files to the Enforcement Query System

Recommendations:

Laurence Gold – The Commission should add documents relating to closed MURs, insofar as documents would be placed on the public record now consistent with applicable law and Commission policy, similarly dating from the beginning.

Lawrence Norton – It is welcome news that the Commission will post on its website the files from closed enforcement matters going back to the opening of the agency. The fact that the information is available on the website, however, is only meaningful if people can find it.

Michael Toner - The Commission recently announced that it has launched the final phase of a project to make all closed enforcement cases available online. The Commission should publicly announce a date by which it seeks to complete this project and provide the public with periodic updates of the progress it is making on the project.

FEC action:

The Commission will complete the final phase of the project to make its full archive of closed enforcement matters available online. This will result in approximately 4,000 closed MURs – consisting of approximately 770,000 pages of documents covering the 24-year period from the inception of the Agency to 1999 – being accessible in digital form on the FEC website. All cases since 1999 are currently available via the Enforcement Query System.

Estimated completion date: November 30, 2009

4. Enforcement Query System enhancement

Recommendations:

Lawrence Norton – The Enforcement Query System does not and has never worked well.

Matthew Sanderson – Add a "locate in result" function to the Enforcement Query System search engine that would allow users to comb through an initial search's results.

Brian Svoboda – The Commission's Enforcement Query System is not as easily searched as the advisory opinion page is. Even focused searches tend to generate an unwieldy number of MURs.

Brian Svoboda - The Commission may want to consider an electronic equivalent of the MUR index available in the Public Records Office, where one can browse MURs by respondent names, statutory and regulatory cites, and such.

Brian Svoboda – The litigation page is most helpful for recent cases. It could benefit from expansion, having older cases represented not simply by the abstracts published in the FEC Record, but also with links to opinions, orders and pleadings.

Michael Toner - The Commission should consider making improvements to the functionality of the MUR database in order to ensure that search results are complete and accurate. The Commission should provide the public with more detailed instructions on each search method, including identifying the best search methods to employ to achieve comprehensive search results.

FEC action:

The Commission is exploring improvements to its Enforcement Query System. The search capabilities in the existing system are too limited. Improvements to the Enforcement Query System should make the search capabilities similar to the capabilities of the Advisory Opinion Search System.

Estimated completion date: November 27, 2009

5. Regulations database

Recommendations:

Laurence Gold – The Commission should provide documents relating to rulemakings from the beginning, at least in the manner now available for those that have occurred in recent years.

Michael Malbin - Regulations database -- The Commission should provide topical access to regulations material. The current compilation is cumbersome.

Laurence Zakson – Create annotated regulations.

Kim Piker - The website for regulatory information (Law and Regulations) is quite non-intuitive.

William Roth - Allow entering regulatory materials online, instead of a 1990's style tool.

FEC action:

The Commission is developing a regulations database, a process for searching rulemaking materials comprehensively and offering annotated text for regulations.

Estimated completion date: February 22, 2010

D. Strategic Initiative

1. Data warehousing

Recommendations:

Matt DeBergalis - The Commission has a unique ability to serve as a kind of "neutral data warehouse" for compliance information, establishing standard data formats and online protocols, providing canonical identifiers for individuals and vendors that appear in compliance filings, ensuring interoperability, and publishing reference implementations of its own software where appropriate. A clear data model opens the door to third parties who can build their own independent tools for submitting, analyzing or visualizing committee disclosure data. Some tools may prove useful to many committees or other interested parties; indeed, the Commission should search for ways to encourage developers to publish these tools. Others will be developed privately, perhaps on behalf of an individual committee to answer strategically important questions, or a third-party

watchdog searching for hidden trends or archetypes. These tools may potentially remain far from the public's eye.

FEC action:

The Commission is developing a new data storage platform that will allow for flexible search and retrieval of all information taken from disclosure reports through standard reports and interactive queries.

Estimated completion date: 2011

2. Web Content Management System

FEC action:

The Commission is exploring new technologies for storing and retrieving a wide range of documents created and received in the normal course of its work. These tools may also offer opportunities to make significant improvements in the way some of this material is made available to the public. Content management tools allow for storage, search and retrieval of information that comes in a variety of forms (*e.g.* word processing documents, images) using a single search and retrieval process.

Estimated completion date: begin evaluation by March, 2010

3. Federated search – single entry to access all information

Recommendations:

Jennifer Jaketic – Improve overall search engine. The current search engine pulls up nonrelated articles.

Clay Johnson - Replace searches for each individual database with a single search that can be easily narrowed by the user at the outset.

Michael Malbin - The general search engine should include everything, including the databases.

William Roth – Do a better job of Search Engine Optimization so regulatory results can be found on Google/Yahoo searches. Propose a microformat to Google so the search engine can pick up entries better.

Jennifer Jaketic – The current search engine pulls up non-related articles.

Bev Jeskie - There should be a search so you could type in a person's name to see if they gave money to certain candidate instead of having to look through the complete report.

Lawrence Norton/James Kahl - It would be helpful if a website visitor could click on a "Search FEC Records" button and be presented with the option of searching advisory opinions, MURs, litigation documents, etc.

Lawrence Norton/James Kahl - The Commission should move toward a system where one could enter the name of an individual or organization and find a list of closed enforcement matters, advisory opinions, and other links that relate to that person or individual.

Nathaniel Pearlman - Search fields like employer and occupation should have sufficient space to allow all possibilities. Back-end data should be moved into a modern structure to enable queries. Data validation rules to prohibit bad data should be improved.

Matthew Sanderson – Include joint fundraising committees as a searchable "committee type" for the Commission's search engines.

FEC action:

The Commission is studying ways to expand existing search capabilities, which along with its examination of content management systems is intended to provide an integrated search engine – a single entry to access all information – to allow comprehensive search of all material on the FEC website.

Estimated completion date: TBA

E. Website Governance & Management Process

Recommendations:

Jonda Byrd – It is very important to have management at the highest level supportive of the organization.

Jonda Byrd – The web governance structure at the EPA includes a Web Council (46-member body made up of a content representative and an infrastructure manager from each program and region of the EPA) and an Innovations Council.

Martha Dorris – The Commission can engage with its customer in a whole range of ways (*e.g.* new public dialogue tools).

Arnold Felberbaum - Conduct focus groups with organizations that utilize the website regularly to ascertain possible improvements and answer the question of

"what don't they have that they need." Implement online surveys for potential input and recommendations from "random" visitors. Identify the type of person or the characteristics of the visitor. Consider doing surveys after major functions to seek input regarding improvements.

Laurence Gold – The Commission could undertake a regular and ongoing process of engagement with regulated groups, technical experts and others in order to elicit advice about the Commission's website and Internet communications on an informal basis, without having to do so via Federal Register notices and formal comments and hearings, useful as those may be, especially at the outset now.

Clay Johnson - The Commission should provide opportunities for public outreach. Sunlight created an FEC brainstorm feature and solicited ideas from members of the public on ways to improve the Commission's website (link to complete results and a summary of the most promising suggestions are detailed in Sunlight's written testimony).

Clay Johnson - The Commission should hire a Director of New Media, an expert in online communication and technology who reports directly to the Deputy Staff Director for Management (rather than the Director of IT, the CIO or CTO).

Sheila Krumholz – The Commission should embrace an interactive dialogue with the public and various FEC constituencies (*e.g.* Google Groups, service ticket system for tracking errors and corrections).

Bernie Lubran – The Commission should survey its customers to find out who is coming to the website and why, whether or not site visitors are able to accomplish what they came to do, assess their satisfaction with the overall experience as well as their satisfaction with the functionality of the website, and benchmark the FEC's website performance against other government websites with similar objectives in order to develop a strategy to make the website as good as the "best in government" and the "best in business."

Michael Malbin - The Commission should not rely entirely on other entities, such as the media or nonprofit organizations, to reach the public.

Lisa Welchman – It is important to have structured and persistent and clear leadership from the Commission about what needs to get done. The Commission also needs to establish formalized governance (*e.g.* a charter, policy setting, a well formed and enabled web team).

FEC action:

The Commission is developing a structure for participation in management and decision making regarding the FEC website.

Estimated completion date: TBA

III. COMMENTS NOT ASSOCIATED WITH ONGOING INFORMATION TECHNOLOGY PROJECTS

A. Website Usability

Recommendations

Center for the Study of Elections and Democracy, Brigham Young University - It would be helpful if there were quicker ways to find data. The campaign finance map is a step in this direction. Quick and easy menus for PACs, 527s, Parties, Candidates (Presidential and Congressional), etc. would make the site more user-friendly. Making summary tables of campaign finance data easily accessible from these menus would be very helpful.

Kalstl – Provide an "unsubscribe" link.

Diane Lenning - Make icons that match titles to understand the categories easier.

George Phillies - The printed images generate an astonishingly large number of pages relative to the information on them.

Anna Wagner – it is difficult to find the mailing address for a campaign.

Laurence Zakson – Improve the Resources for Committee Treasurers page. Place links to websites of the House and senate committees on the front of the Resources for Committee Treasures page and place a direct link to committee rules governing gifts and travel.

B. Additional Information on the Website

Recommendations:

Jan Baran – The Commission should provide Political Action Committee data and statistical summaries on a regular basis, hopefully quarterly and certainly no less frequently than semi-annually.

Center for the Study of Elections and Democracy, Brigham Young University - It would be helpful if the FEC released a user-friendly version of Federal election contribution and spending regulations for each election cycle (*i.e.* pre-BCRA, post-BCRA, what individuals, parties, PACs, etc. can give to Federal candidates, parties, PACs, etc.).

Ken Doyle – Post information that it has decided to make public in response to specific requests under the Freedom of Information Act.

Laurence Gold – The Commission should provide additional materials online, including the complete legislative history of the Act and all of its amendments, transcripts of Commission proceedings, judicial decisions on the merits in cases to which the Commission has been a party, U.S. Supreme Court, Federal courts of appeals and State supreme court merits decisions concerning State and local campaign finance laws, legal treatises, and law review articles and other scholarly analyses of the Act.

Edward Hamilton – The Commission should add a link on its website to allow candidates or voters to file complaints online.

Clay Johnson - Public means online, so any report prepared by the Commission that is supposed to be available to the public must be available online. Because the FEC's website is a natural destination for individuals who are interested in all aspects of elections, not just campaign finance data, it is also appropriate to provide studies and other government reports or analysis related to elections on the FEC's site.

Beth Kingsley – Make campaign guides available in HTML with revisions made directly to the document.

Michael Malbin - The Commission should clearly indicate which reports, if any, have been superseded by an amended report. The Commission should also provide users with access to a list of all the most recent reports, filtering out amended reports, for any given committee.

Michael Malbin - The Commission should include links to Statutes at Large and the U.S. Code (with key words and links) so that users may access statutes that make up the amendments to FECA.

Lawrence Norton – There should be no major gap between when a blogger is handed a copy of a Statement of Reasons and when the Commission's press office formally releases it.

Matthew Sanderson – Make more presidential audit reports available online.

Brian Svoboda - The Commission should provide Commissioner Statements of Reasons on a separate page and in a searchable format like the AO search engine, etc.

Brian Svoboda - The Commission should add a legislative history page (an online version of the bound legislative history volumes that would allow users to browse and search committee reports and Congressional Record testimony).

Brian Svoboda - The Commission should provide a searchable press release database, and to the extent practicable, provide hyperlinks to referenced documents.

Michael Toner - The Commission should create a searchable database similar to the MUR database that would allow users to search by committee, date, word or phrase in the document, statutory citation, and regulatory citation. The Commission should create a complete, searchable database of audit reports by a publicly announced date certain and provide the public with updates on the progress that is being made.

Laurence Zakson – Provide a comprehensive guidebook online.

C. Data

Recommendations:

Matt DeBergalis - The Commission has a unique ability to serve as a kind of "neutral data warehouse" for compliance information, establishing standard data formats and online protocols, providing canonical identifiers for individuals and vendors that appear in compliance filings, ensuring interoperability, and publishing reference implementations of its own software where appropriate.

Matt DeBergalis - The universe of disclosure data that he Commission intends to publish should be integrated into a comprehensive schema, revolving around "facts" such as contributions to a committee, and "dimensions," which might include committee information individual donor information, election information, and other metadata. The Commission should target its greatest efforts into focusing on individual facts and their supporting dimensions. The Commission should canonicalize the aggregate incoming data into standard forms before publishing them (canonicalization is the process of converting various similar representation into a single, standard value). The Commission should also develop standards for coding contributors, employers, industries, locations, purposes, and vendors with unique and consistent identifiers.

Jennifer Jaketic – It should be easier to find what committees gave to which candidates and vice versa. Right now, it takes 5 clicks from the homepage to find this information.

Jennifer Jaketic – The format should be similar to OpenSecrets.org.

Bev Jeskie - post individuals contributions to candidates in aggregate amounts.

Clay Johnson - The Commission should make it possible and easy for outside organizations to add value to the data available on the FEC website, and make it available on other sites.

Beth Kinsley - When searching for all reports filed by a committee using the "view images of all financial reports" section, the results display in reverse chronological order by year, but chronologically within years. This presentation makes it difficult to scan a listing and determine if all reports have been filed, whether they have been filed on time, and if there have been problems with timely filing whether the trend is towards improvement or not.

Sheila Krumholz – Providing meaningful access to public data, searchable, sortable and downloadable is an inherently government function which, regardless of other options available, the FEC should provide.

Sheila Krumholz – Center for Responsive Politics realizes that the wholesale function that is FEC's role, providing the data, architecture, and protecting the integrity of the data itself, may be a lesser focus of this initiative. Nevertheless, it's one key thing that comes to mind when asked to consider recommendations for improving the FEC's disclosure function.

Theresa McGrath - Put the election year directly next to the Candidate's name

Theresa McGrath - Separate incumbents' filings by the year.

Theresa McGrath - It would be nice to manipulate queries - as in an excel spread sheet, but online so people wouldn't have to download large files – and perhaps allowing for a download as well - but separate

Theresa McGrath - Search functions should pick up names of candidates by first name then last name.

Michael Malbin - The Commission has improved the presentation of individual candidate data (provided the user gets to the information through the interactive map rather than the Commission's disclosure search engine). The Commission should redesign certain presentation of individual candidate data, using graphs, pie charts, etc. The Commission should allow users to call up the answers to a predetermined set of contextual questions. The presentation should also pull in material from other FEC datasets.

Michael Malbin - The Commission should make sorting and downloading data a high priority. All returned results for individual candidates or committees should be downloadable in Excel and in limited text format. While on the website, the user should be able to sort on any column or field.

Michael Malbin - The Commission should use user-generated charts and graphs to improve a page's attractiveness, but only if it does not crowd out higher priorities.

Michael Malbin - Availability of raw data is essential for users, including Campaign Finance Institute. Overnight access is useful but certain users, such as journalists, would find it more helpful to have access to real time data.

Nathaniel Pearlman - The Commission should do a better job of protecting the personal information of those who contribute (*e.g.* list theft).

Nathaniel Pearlman - The Commission should focus on building features of the website and tools that are within scope, and avoid coding of contributions like OpenSecrets, or otherwise duplicating functionality available from the community of non-profits and campaign tool vendors that support the FEC and its mission.

Nathaniel Pearlman - The Commission should improve its data architecture.

Brian Svoboda -The Commission should carefully consider its presentation of campaign finance data, considering the myriad uses for these data. Think creatively about the different ways in which data might be presented and accessed.

Laurence Zakson – The Campaign Finance Reports and Data section should have a function which enables the user to compile income and expense data to determine whether a committee has qualified to become a multi-candidate committee.

D. Filing Platform Improvement/Filing Tools

Recommendations:

Gloria Andersen - When the filer went from paper to electronic filing, the report "double reported" and the filer needed to buy a new computer in order to use the program.

Matt DeBergalis - The Commission should define standard formats for disclosure data and standard protocols for the transmission of disclosure data, and theses standards should build on modern software engineering best practices. Two formatting standards would be particularly valuable: a standard XML representation of campaign finance events, committee records, and communications between the Commission and committees; and an XHTML microformat standard appropriate for use in an interactive website. It is critical that the Commission replace the closed software systems currently used to upload disclosure data with standard network protocols that third parties can easily tie into their existing systems.

Matt DeBergalis - The Commission should publish the disclosure system itself.

Craig Engle - The Commission should rethink the structure and layout of the committee contribution and expenditure reporting forms, particularly Form 3X, which allows only three receipts/disbursement transactions per page, leaving excess white space and wastes paper/resources.

Jeremiah Gray – Adopt open sources and formats.

Susan Grupe – Electronic filing should display the same as the paper form

Paul Houghtaling - FEC.file will never replace the software packages offered by independent vendors that provide extra bells and whistles that the FEC should not be concerning itself with. Smaller campaigns, with significantly less in financial resources, maybe better served using a free system, like FEC.file.

Paul Houghtaling/Political CFOs - The Commission should spend a fairly significant amount of time making improvements to the current FEC.file software. FEC.file is very difficult to use during the report conciliation process and does not allow a user to effectively produce reports that can be used to crosscheck for accuracy, the data between what is in one's accounting system, and what is in FEC.file. Additionally, FEC.file does not currently allow a State party committee to effectively produce reports on allocable disbursements without printing the Schedule H4's as part of a printed FEC Report.

Clay Johnson - The Commission should enforce software standards more strictly and refuse to certify campaign packages that do not comply with such standards (to mitigate missing, incomplete or jumbled data).

Clay Johnson - The Commission should consider expanding the number and types of documents that are required to be filed electronically.

Clay Johnson - The FEC has implemented rules to facilitate electronic filing of campaign reports, including data formats for information such as donor name and occupation/employer. Unfortunately, it is extremely common for report data to be missing, incomplete or jumbled. Data that is filed in nonstandardized formats is difficult to manage, may not be accurate and must be cleaned up to make it useful to the public.

Patricia Paey – Notify applicants of the status of their applications.

Nathaniel Pearlman - The Commission could greatly diminish the last minute filing rush by embargoing reports filed early and posting them online after filing deadline.

Nathaniel Pearlman - The Commission should upgrade and open source FEC.print/FEC.load vendor tools for submitting reports, but not open source FEC.file.

Nathaniel Pearlman – FEC.file users are fairly well served, because it is free and is the program of choice for small operations. A wholesale changing of that application interface will result in substantial headaches for a substantial user community who are accustomed to the current version.

Nathaniel Pearlman - Vendor certification for electronic filing is a burden, but the commenter supports it. California is a good State to refer to as a model – gives vendors sample forms and asks them to re-create them in their software, which enables for example, rapid response time.

Anne Rosenthal – FEC ID #s are not always available on the website.

William Roth – The Commission should improve the tools for filing. The current tools for filing are hard to use, and antiquated. Make it easy to file reports, with a Web 2.0-like web based filing system that could import Excel or a standard XML format files.

Chris Rye - There seem to be a lot of updates to the FEC.file software. Make them downloadable without having to put in committee info every time.

Chris Rye – Provide a MAC version of FEC.file.

FEC action:

The Commission will begin to explore new formats for receiving electronic filings, which would allow greater flexibility in creating new filings, and improved consistency and accuracy in reporting. The Commission is also examining existing processes for validating filings prior to their acceptance to determine whether revisions are needed.